

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
BIRMINGHAM DISTRICT REGISTRY**

**CLAIM NO: KB-2022-BHM-000188**

**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- 4) PERSONS UNKNOWN AS DESCRIBED (IN THE INJUNCTION)  
(5) Mr ANTHONY PAUL GALE  
(6) Miss WIKTORIA SCZCUBLINSKA  
(7) Mr ISA IQBAL  
(8) Mr MASON PHELPS  
(9) Miss REBECCA RICHOLD  
(10) Mr OLIVER CLARKE  
(11) Mr SIKANDER HUSSAIN  
(12) Mr OMAR TAGON  
(13) Mr TY HARRIS  
(14) Mr VIVKASH BALI  
Defendants**

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**SUPPLEMENTARY BUNDLE OF DOCUMENTS FOR USE AT THE REVIEW HEARING  
LISTED ON 26 FEBRUARY 2025**

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## Case Summary

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# Case Summary

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
BIRMINGHAM DISTRICT REGISTRY

Claim No. KB-2022-BHM-000188

**For Hearing 26 February 2025 at 10.30am**

In the matter of an application for an injunction under s.222 Local  
Government Act 1972 and s.130 of the Highways Act 1980

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-

PERSONS UNKNOWN &  
NAMED DEFENDANTS

Defendants

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REPORT ON BEHALF OF THE  
CLAIMANTS ON THE OPERATION  
OF THE INJUNCTION

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### *Introduction*

- 1 On 27 February 2024 the Honourable Mr Justice Julian Knowles granted the Claimants a final injunction to address the issue of Car Cruising/Street Racing carried on in their local authority areas.

2 That order made final, and expanded the ambit of, an interim injunction that had originally been granted by the Honourable Mrs Justice Hill on 21 December 2022.

3 Julian Knowles J directed *inter alia* that:

“A review hearing will take place in open court (elh 30 minutes) before a Judge of the High Court (section 9 if practicable) after this order has been in force for 12 months and for no longer than 14 months. The Claimants shall file with the court a succinct report to inform the court of their experience with the publication, operation and enforcement of the extended order, including for example, breaches, warnings or problems, if any arising out the extended order (including the Power of Arrest)..” [v1/D80/10].

4 By an order [v1/D16-19], sealed on 8 May 2024 Her Honour Judge Emma Kelly, sitting as a judge of the High Court, set the date for the review hearing and gave ancillary directions as to service of the notice of hearing and the filing of further evidence.

5 This report relies on several sources of information. That information will be before the court in the form of witness statements. The witness statements are contained in two bundles filed with the court:

- (1) Volume 1 is a core bundle and contains the Claimants' overarching witness statements describing the operation of the Injunction;
  - (2) Volume 2 contains greater detail, particularly with regard to the committal proceedings brought following breaches of the Injunction
- 6 References to the bundles appear in square brackets with the volume number appearing first followed by the page number and, if appropriate, the paragraph number.

### *Purpose of a Review Hearing*

- 7 The Supreme Court in *Wolverhampton City Council & Others v London Gypsies and Travellers & Others* [2023] UKSC 47 stressed the need for 'newcomer injunctions' to be kept under review (c.f. [v2/H72/para 225]).
- 8 In *Transport for London v Persons Unknown* [2025] EWHC 55 (KB) Morris J stated that a judge on a review hearing should:
- "...consider whether any reasons or grounds for discharge of the Final Injunctions emerged and whether there was a proper justification for the continuance of the Final Injunctions.

(The claimant) has already provided detailed evidence at a full trial and the Court has, on two occasions, already made a full determination of the issue of risk and the balance of interests. **In my judgment, in those circumstances there needed to be some material change in order to justify a conclusion that the Final Injunctions should not continue.**" (paras 54 & 55)."

*Service & Publicity*

9 The twenty-first witness statement of Paul Brown [v1/B70-185] addresses the issue of compliance with the terms of the order regarding publicity and service on the defendants.

10 It should be noted that as required by the order of HHJ Kelly notice of the review hearing has been given to the world-at-large [v1/B71/6-/B74/14] as well as the individual named defendants [v1/B75/15-B75/20] in respect of the initial notification.

11 Further, as required, recent notice of the review hearing has again been given to the world-at-large [v1/B76/21-/B78/28] as well as the individual named defendants [v1/B79/30-31].

12 Indeed the Claimants have gone beyond that which was ordered by: publicising the matter to neighbouring police forces [v1/B78/29];

issuing additional media releases [v1/B80/33]; via social media posting [v1/B80/34-35] and; on the Claimants' websites [v1/B80/36].

### *Operation of Injunction*

13 The Final Injunction has now been in force for a year and has achieved a substantial measure of success. There has been a reduction in both the frequency of incidents and their locations.

14 Please see the witness statements of Pardip Nagra (PN) [v1/B1-B52] and PC Mark Campbell (MC) [v1/B61-69]. The Injunction is perceived as being effective and is welcomed by the Claimants and the communities they represent.

15 In particular reference is made to:

- (1) PN [v1/B2/3-5]
- (2) PN [v1/B3/8-B4/11];
- (3) PN [v1/B4/12-16];
- (4) PN [v1/B5/17-20]
- (5) MC [v1/B62/5-B64/6]
- (6) MC [v1/B66/13]



16 However, there remains a well-founded concern that were the injunction to be discharged or its terms relaxed there would be rise in car cruising c.f. PN [v1/B6/24] & MC [v1/B62/5].

### *Enforcement*

17 Pardip Nagra has provided a Schedule of the committal applications made for breaches of the injunction [v1/B30-B33]. Committals have resulted in suspended custodial sentences.

18 Further details of the individual contempts can be found within Section E of volume 2.

### *Legal Developments*

19 Two recent sets of statutory provisions have a potential impact on Persons Unknown Injunctions namely:

- (1) Police Crime Sentencing and Courts Act 2022 made modifications to the law relating to the criminal offences of public nuisance and wilful obstruction of the highway. In the case of *public nuisance*, the 2022 Act replaced the previous common law offence with a statutory offence; the effect of which was to reduce the maximum sentence from an

unlimited term to a maximum of 10 years. The sentence on summary conviction was increased to 12 months.

- (2) Public Order Act 2023 enacted, *inter alia*, two new offences; s.1 introduced the summary only offence of "locking on", punishable with imprisonment up to 6 months and/or an unlimited fine. Section 7 introduced the offence, triable either way, of interference with use or operation of key national infrastructure, punishable on summary conviction as in the case of s.1.

Section 18(6) of the Act preserved the ability of parties to bring civil proceedings.

20 It is respectfully submitted that:

- (1) The provisions of the Police Crime Sentencing and Courts Act 2022 do not affect the position. The commission of both the offence of causing a public nuisance and other serious criminal offences have always been central to the Claimants' claim c.f. the judgment of Julian Knowles J [v1/D28/21-D29/23].

As his lordship recognised the *B&Q* and *Bovis*, the criteria for granting a civil injunction in support of the criminal law were fulfilled [v1/D31/33-D33/40].

The police have successfully prosecuted organisers of street racing for the criminal offence of causing a public nuisance [v1/B67/15] but this is an adjunct to the injunction not an alternative.

- (2) As regards the Public Order Act 2023 it is respectfully doubted that it is applicable. Car cruising is not a 'protest activity'. It will not involve 'locking on' or tunnelling.


Even were it possible to bring such conduct within s.7 of the Act (interference with use or operation of key national infrastructure) an injunction would still be appropriate. As HHJ Emma Kelly observed at para 88 of *North Warwickshire BC v Barber ats ors* [2024] EWHC 2254 (KB):

"...the existence of relevant criminal offences does not, of itself, mean it is inappropriate to grant an injunction to restrain public nuisance nor, particularly in cases where a local authority has a particular responsibility for enforcement, to restrain breaches of acts which would amount to other criminal offences."

### *Conclusions*

- 21 All four Claimants support the continuation of the Injunction. It has been and continues to be effective in reducing anti-social behaviour and promoting public safety.

I, the undersigned, confirm that I am duly authorised to sign this Report on behalf of all four Claimants.

Signed: 

Print name: ADAM JAMES RICHARD SHEEN

Position Held: Solicitor-Advocate (Civil and Criminal), Litigation Team, Legal Services, Wolverhampton City Council

Date: 18 February 2025

**For Hearing 26 February 2025 at 10.30am (Ritchie J)**

In the matter of an application for an injunction under s.222 Local  
Government Act 1972 and s.130 of the Highways Act 1980

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-

PERSONS UNKNOWN &  
NAMED DEFENDANTS

Defendants

---

NOTE

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***Introduction***

- 1 The claimants filed their report on the operation of the Injunction for this review hearing on 18 February 2025. This Note uses the same referencing the bundles filed on behalf of the claimants.
- 2 It is anticipated that there will be an authorities bundle.
- 3 As stated in the report the claimants' position was that "there needed to be some material change in order to justify a conclusion that the Final Injunctions should not continue".

4 This remains the claimants' position and is fortified by the judgment of Hill J in *Valero Energy ats ors v Persons Unknown* [2025] EWHC 207 (KB), handed down on 3 February 2025, where the judge reaffirmed that principle see paras 20 to 23.

5 However, on 19 February 2025 Nicklin J handed down judgment on the application for a final injunction in *MBR Acres Ltd ats ors v Curtin* [2025] EWHC 331 (KB) ('MBR Acres').

6 That action concerned protest activities at an animal testing site and was described as a *contra mundum* injunction. Nicklin J stated at para 390 that:

"...it is my very clear view that all *contra mundum* 'newcomer' injunctions, particularly those in protest cases, should include a requirement that the Court's permission be obtained before a contempt application can be instituted. This would reduce the risks of a *contra mundum* injunction being used as a weapon against perceived adversaries for trivial infringements."

7 That could be said to represent a change in the case law applicable to such orders. The purpose of this Note is to address the implications of that judgment.

### *MBR Acres Judgment*

8 The claimants take issue with a number of aspect of the judgment which are particularised below:

- (1) the conclusion that a decision to bring contempt proceedings for a criminal breach should be subject to the court's permission [para 373];
- (2) such permission applications should require evidence that the respondent had actual knowledge of the terms of the injunction [para 389(2)] and
- (3) that alternative service of such injunctions is not appropriate [para 399(2)].

### *Overarching Submission*

9 The claimants overarching submission is that MBR Acres does not alter matters in this case. The judgment can be distinguished on any, or all, of the following grounds:

- (1) it was a 'protester case' brought by a private company;
- (2) it would render the injunction granted in this case unworkable;
- (3) the decision was, apparently, made without reference to relevant case law decided after the decision of the Supreme Court in *Wolverhampton City Council & Others v London Gypsies and Travellers & Others* [2023] UKSC 47 ('*Wolverhampton Travellers*').

### *Distinction between restraint of private protester claims and public duty cases*

10 As is apparent from Nicklin J's judgment the first claimant, a claimant private company, had abused the injunction granted. That

abuse included an application to commit a solicitor to prison [para 43] which was dismissed and certified as totally without merit.

11 In the instant case the claimants are all local authorities acting in pursuance of statutory duties. In giving judgment Julian Knowles J recognised that:

- (1) the claimants were acting under a statutory duty [v2/I13/39];
- (2) the criteria for precautionary relief to restrain criminal conduct were fulfilled [v2/I12/33-I14/41]; and
- (3) there was no risk that innocent bystanders would be caught by the injunction [v2/I23/79].

### *Unworkable*

#### *Permission*

12 Paragraph 4 of the injunction has a Power of Arrest attached to it. Where a person is arrested under the Power of Arrest they must be brought before a judge within 24 hours (s.27(6) Police and Criminal Justice Act 2006).

13 It is standard practice at such a hearing to ensure that the defendant is made aware of his rights including the rights: to silence; legal representation (including legal aid) and; a short adjournment.



- 14 Judges commonly require a formal application to commit to be made, on form N600, (with the consequent disclosure of evidence) before allowing the matter to proceed.
- 15 A requirement for permission to be sought before contempt proceedings are initiated would require a police officer exercising a Power of Arrest to seek the court's permission before making any arrest.
- 16 Furthermore, the first hearing following arrest provides opportunity for a judge to make plain that the suggested contempt is not a breach of the order or trivial.

### *Knowledge*

- 17 In MBR Acres Nicklin J based this aspect on para 132 the judgment of the Supreme Court in *Wolverhampton Travellers* at para 132 [v2/H45/132] and reached the conclusion that actual knowledge was required. He then went further to require evidence of such knowledge to be filed with any application for permission.
- 18 This issue was considered in *Wolverhampton CC v Phelps* [2024] EWHC 139 (KB) [v2/E26]. That case was one of the committal applications made under this injunction. The defendant, Phelps, sought to argue that he was unaware of the terms of the injunction so could not be in contempt.

19 The judge rejected the defendant's evidence that he was unaware of the injunction regarding him as an unreliable witness. She also considered whether a defendant who had been served with an injunction by, alternative means, was fixed with knowledge of its terms. She held [paras 47-49]:

47 The problem with the Defendant's submission on this issue is that it requires the Third Claimant to prove not only service, which it has done, but also something more, namely that the Defendant did not have personal knowledge of the Amended Interim Injunction. The requirement to prove "something more" was considered by the Court of Appeal in *Cuciurean* where, at paragraph 56, Warby LJ held that "there is no authority to support any such proposition. More than that, the proposition appears contrary to authority." Warby LJ went on, at paragraph 58, to agree with the first instance judge's view that such a formulation "replaces the very clear rules on service with an altogether incoherent additional criterion for the service of the order." The Defendant's argument in this case gives rise to exactly the same concerns. Instead of service being governed by the express terms of paragraph 11 of the Combined Directions Order, an additional criterion would have to be applied. That additional criterion is not only vague ("knowledge of the existence of the injunction albeit not the precise terms") but founded on matters than can only be in the personal knowledge of the Defendant.

48 The Defendant's submission that the decision of the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* undermines the position of the law as held at paragraphs 54 -62 of *Cuciurean* is unattractive. It must be borne in mind that the issue before the Supreme Court was not whether personal knowledge was required to establish

contempt, nor did the Supreme Court overrule *Cuciurean*. Moreover, in my judgment, insofar as paragraph 132 of *Wolverhampton* requires an individual to “knowingly” breach an injunction before contempt can arise, such a formulation is consistent with the decision in *Cuciurean*. Warby LJ, at paragraph 58, held that “‘notice’ is equivalent to ‘service’ and vice versa...” The knowledge referred to by the Supreme Court in *Wolverhampton* is to be equated with the notice provided by service. There is thus no inconsistency on this issue between *Cuciurean* and *Wolverhampton*.

49 For the aforementioned reasons, the Defendant’s submissions on this issue are flawed and contrary to the current authorities. The Third Claimant has proved service in accordance with paragraph 11 of the Combined Directions Order and does not additionally need to prove that the Defendant was personally aware of the existence of the order.

20 Judgment in *Phelps* was handed down on 29 January 2024 but Nicklin J does not appear to have been referred to it.

21 The requirement for evidence of actual knowledge to be filed as part of any permission application would have meant that no proceedings could have been brought against Phelps:

- (1) the proof of his personal knowledge was based on his own evidence to the court; and
- (2) Nicklin J held [MBR Acres para 399(2)] alternative service was not appropriate in newcomer proceedings.

### *Service/Notice*

22 At para 399(2) of MBR Acres Nicklin J stated:

It is not appropriate to provide for any sort of alternative service of the injunction order. It is for the First Claimant to decide how best to give notice of the injunction to those who need to be aware of its terms. In terms of any subsequent enforcement action, the burden will fall on the First Claimant to demonstrate that the terms of the injunction have come sufficiently to the attention of the person against whom the First Claimant wants to bring contempt proceedings. The effect of paragraphs 3-5 of the Claimants' proposed order would be that, once the relevant steps were completed, the whole world would be deemed to have received notice of the injunction. That would be a palpable fiction. It could even embrace people who are not yet born. Subject to proof of breach of the injunction, it would deliver, practically, a strict liability regime. That is not what remotely what the Supreme Court envisaged, and it is not fair.

23 Assuming that such a requirement was appropriate in MBR Acres it is not appropriate in this case:

- (1) In a protester case at a single site with limited access notices can be erected stating that an injunction is on force and the terms of the order. Once an individual is identified at the site there will be evidence of notice.
- (2) Such an approach is impractical in a borough wide injunction and the service requirements have been carefully tailored and subjected to judicial scrutiny.
- (3) At present the court can require the claimants to do x, y and z to effect alternative service. The suggestion that a claimant can seek committal on the basis that they have done x, y and z which are only scrutinised when permission to make a committal application is sought runs the real risk that the court will say x, y and z are insufficient.

- (4) There is no risk to the unborn. It is hard to conceive of a neonate engaging in street racing/car cruising. Further, the sanctions for contempt would not be available. Any risk is removed by the requirement that orders be time-limited and subject to regular review.

24 In the following cases, decided after *Wolverhampton Travellers*, alternative service was ordered:

- (1) *North Warwickshire BC v Barber and others* [2024] EWHC 2254 (KB). Decision of HHJ Emma Kelly sitting as a judge of the High Court given on 6 September 2024 granting a final injunction in a protester case. Alternative service authorised (see paras 19-24).
- (2) *Enfield LBC v Persons Unknown* [2024] EWHC 3142 (KB). Decision of Hill J given on 6 December 2024 on application for an interim injunction to restrain car cruising. Alternative service authorised (see para 104 iv).
- (3) *Valero v Persons Unknown* [2025] EWHC 207 (KB.) Decision of Hill J given on 3 February 2025 on review of the final order granted by Ritchie J to restrain protesters. Alternative service of the original order had been effective (see paras 11-19).

25 The only post-*Wolverhampton Travellers* case referred to by Nicklin J is *Valero Ltd -v- Persons Unknown* [2024] EWHC 124<sup>1</sup> (KB) at para 366 a case in which alternative service was also authorised [see *Valero* para 58(13)].

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<sup>1</sup> Please note the citation is incorrect it should be *Valero Ltd -v- Persons Unknown* [2024] EWHC 134 (KB)

*Case law since the decision in Wolverhampton Travellers*

26 The essence of this submission is set out in preceding paragraphs of this Note. However a short chronology may assist:

29 November 2023 Supreme Court gives judgment in *Wolverhampton Travellers*

7 May 2024 Final Hearing in MBR Acres

19 February 2025 Judgment in MBR Acres.

*Conclusions*

27 It is respectfully submitted that the existing injunction should continue on its present terms.

**MICHAEL SINGLETON**

Whittall Street,  
Birmingham,  
B4 6DH



Monday, February 24, 2025

- i) Statement of: Paul Brown
- ii) Statement No: 22
- iii) For: Claimant
- iv) Dated: 24.02.2025
- v) Exhibits: PB22A - PB22C

**IN THE HIGH COURT OF JUSTICE  
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**CLAIM NO: KB-2022-BHM-000188**

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and

1. **4) PERSONS UNKNOWN (AS DESCRIBED IN THE INJUNCTION)**
  5. **Mr ANTHONY PAUL GALE**
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  12. **Mr OMAR TAGON**
  13. **Mr TY HARRIS**
  14. **Mr VIVKASH BALI**
- Defendants**

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**TWENTY SECOND WITNESS STATEMENT OF PAUL STEVEN BROWN**

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I, PAUL STEVEN BROWN of the City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my 22nd statement in these proceedings.

2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the “Black Country Boroughs”) seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs. This is a statement on behalf of all four Claimants.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, after this was granted, to promote the existence of the injunction and the Power of Arrest which is in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police. Paragraph 6 of the order of the High Court made by Her Honour Judge Kelly on 08 May 2024 required the Claimants to complete a series of steps before 16:00 on 24 May 2024 to publicise the outcome of the hearing and bring it to the attention of “Persons Unknown”.
6. Further, the order of 08 May 2024 required the Claimants to repeat the actions specified in those steps no earlier than 6 January 2025 and to have completed a repeat of those required actions in such steps by 16:00 on 24 January 2025.
7. My 21<sup>st</sup> statement in these matters (dated 17 January 2025) detailed the various steps that were taken to complete the above actions prior to the respective deadlines. This 22<sup>nd</sup> statement is to confirm the steps the Claimants took on 24 January and subsequently.
8. The required documentation was uploaded to the street racing websites of the four Claimants (these being Wolverhampton:[www.wolverhampton.gov.uk/street-racing-](http://www.wolverhampton.gov.uk/street-racing-)



[injunction](https://go.walsall.gov.uk/black_country_car_cruising_injunction), Walsall: [https://go.walsall.gov.uk/black\\_country\\_car\\_cruising\\_injunction](https://go.walsall.gov.uk/black_country_car_cruising_injunction), Sandwell: [www.sandwell.gov.uk/streetracing](http://www.sandwell.gov.uk/streetracing) and Dudley: [www.dudley.gov.uk/car-cruising-injunction](http://www.dudley.gov.uk/car-cruising-injunction)) by 24 January 2025. Wolverhampton and Sandwell webpages were completed and all links live before 16:00 on 24 January, 2025, however, technical issues relating to the very large size of the second bundle (55mb) caused issues when transferring it and necessitated it being split into more than one document, and therefore the second bundle was only uploaded to the Walsall and Dudley webpages by 16:45 on 24 January, 2025. Please see screenshots of the webpages and documentation in **ExhibitPB22A attached hereto**.

9. The Court may wish to know that the fact that the webpages had been updated was promoted via a media release issued on 29 January, 2025. Please see “Street racing review hearing to be held next month” in **ExhibitPB22B attached hereto**. This was also published on the four Claimant councils’ websites and promoted on the City of Wolverhampton Council’s X and Facebook pages, with posts shared by other Claimants – please also see **ExhibitPB22B attached hereto**. Notice of the hearing was also given by way of an article published by the Local Government Lawyer on 20 February 2025 (please see <https://www.localgovernmentlawyer.co.uk/transport-and-highways/443-transport-and-highways-news/60055-street-racing-injunction-to-be-reviewed-by-high-court>) and referenced in a news release issued by Sandwell Council about a new road safety campaign on 20 February 2025 (please see <https://www.sandwell.gov.uk/news/article/562/drive-safely-for-the-ones-you-love>). Printouts of the pages referred to in the above links, can be found in **Exhibit PB22B attached hereto**.
10. The Court may also wish to know that the named Defendants’ solicitors were served with a link to the bundles and the bundles themselves on 24 January 2025. Please see **ExhibitPB22C attached hereto**.
11. Serving and publicising was completed by uploading further documentation including latest case summaries and case reports onto the four Claimants’ street racing webpages, and by making hard copies of the same (along with the full bundle) available at the receptions of the Claimant councils for any interested parties who cannot, for any reason, access the bundles online. Confirmation was received that

this was completed from Sandwell Council at 15:47 on 18 February, the City of Wolverhampton Council at 16:23 on 18 February, Dudley Council at 13:08 on 20 February, and Walsall Council at 13:45 on 20 February.

12. Based on the above, and on the contents of my 21<sup>st</sup> statement in this matter, I would humbly submit that the Claimants have fully complied with the requirements of the order of the High Court made by Her Honour Judge Kelly on 08 May 2024 by the deadlines of 24 May 2024 and 24 January 2025 respectively.

13. I will continue to ensure future steps in the Communications Plan are acted upon at the relevant time and will continue to liaise with my counterparts in Communications Teams of Dudley, Sandwell and Walsall Councils and West Midlands Police to ensure that they are disseminating the information as and when necessary.

### **STATEMENT OF TRUTH**

I believe that the facts stated in this Witness Statement are true. I understand 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 and honest belief in its truth.

Full Name: PAUL STEVEN BROWN  
Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed: *Paul Brown*

Print Name: PAUL BROWN  
Dated: 24 February 2025

1) Claimant  
2) Paul Brown  
3) 22<sup>nd</sup>  
4) PB22A  
5) 24 February 2025

**IN THE HIGH COURT OF JUSTICE      CLAIM NO: KB-2022-BHM-000188**  
**KING'S BENCH DIVISION**  
**BIRMINGHAM DISTRICT REGISTRY**

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

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**Claimants**

**and**

**(1- 4) PERSONS UNKNOWN AS DESCRIBED (IN THE INJUNCTION)**  
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**(9) Miss REBECCA RICHOLD**  
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**(11) Mr SIKANDER HUSSAIN**  
**(12) Mr OMAR TAGON**  
**(13) Mr TY HARRIS**  
**(14) Mr VIVKASH BALI**

**Defendants**

---

**EXHIBIT PB22A**

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This is the document referred to in the Witness Statement of Paul Brown dated 24 February 2025 as "Exhibit PB22A."

## High Court grants order banning street racing in the Black Country

HOME / PARKING AND ROADS / HIGH COURT GRANTS  
ORDER BANNING STREET RACING IN THE BLACK COUNTRY

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it. Breach of an injunction is a contempt to court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

- "Burnouts" – causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed
- "Donuts/Donutting" – causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created
- "Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- "Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

The injunction and power of arrest were granted on Tuesday 27 February, 2024, will remain in force for a period of at least three years, and will be subject to an annual review.

The next hearing is scheduled to take place on 26 February 2025 at 10.30am at the High Court of Justice, King's Bench Division, Birmingham District Registry at Birmingham Civil and Family Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS. Defendants who wish to file any evidence in respect of the review hearing must do so by 7 February 2025.

Full details of the injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found in the downloads section of this page. Please note, this is in the process of being updated.

Incidents of street racing should be reported via [asbu@wolverhamptonhomes.org.uk](mailto:asbu@wolverhamptonhomes.org.uk) or to West Midlands Police on 101. In an emergency, always dial 999.

The injunction is advertised by signs in key places on the highway, these signs can be seen in the Downloads section. Here you can find the locations of these signs. If signs are missing or damaged, please report this on 01902 551155 or [Contact Roads](#).

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

To contact the claimants, write to: FAO: Black Country Car Cruise, Legal Services, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton WV1 1RG. Alternatively, email [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk) or call 01902 556556.



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Street racing injunction review hearing next week	>
High Court continues Interim Black Country street racing ban	>
Street racers could face jail for breaching court Injunction	>

### DOWNLOADS

- [Bundle for Review Hearing \(26 February 2025\) Volume 1 of 2](#)
- [Bundle for Review Hearing \(26 February 2025\) Volume 2 of 2 - Segment 001](#)
- [Bundle for Review Hearing \(26 February 2025\) Volume 2 of 2 - Segment 002](#)
- [Wolverhampton City Council et al v Persons Unknown - Approved Judgment](#)
- [Amended Claim Form and Amended Particulars of Claim \(29 May 2024\)](#)
- [Certificates of Service \(re Service of Final Injunction and Final Power of Arrest\)](#)
- [Claimants' Evidence of Compliance with service steps \(26 April 2024\) - Part 1](#)
- [Claimants' Evidence of Compliance with service steps \(26 April 2024\) - Part 2](#)
- [Final Injunction \(as amended\), Final Power of Arrest \(as amended\) and Service Directions \(27 February 2024\)](#)
- [Judgements \(Committals\) and Committal Orders](#)
- [Notice of and Directions for Review Hearings & Certificates of Service](#)
- [Orders Joining Named Parties as Defendants to the injunction](#)



City of Wolverhampton Council street racing page

# Black Country street racing injunction

## Overview

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

The Black Country area includes all of the boroughs of Dudley, Sandwell, Walsall and Wolverhampton.

The injunction and power of arrest were granted on Tuesday 27 February 2024, will remain in force for a period of at least three years, and will be subject to an annual review.

## Date of next hearing

The next hearing is scheduled to take place on 26 February 2025 at 10.30am at the High Court of Justice, King's Bench Division, Birmingham District Registry at Birmingham Civil and Family Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS. Defendants who wish to file any evidence in respect of the review hearing must do so by 7 February 2025.



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## What the injunction means

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area in which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it. Breach of an injunction is a contempt of court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

- burnouts - causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed
- donuts/donutting - causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created
- drifting - turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- undertaking - passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code

## Report street racing

Email [asbu@wolverhamptonhomes.org.uk](mailto:asbu@wolverhamptonhomes.org.uk) to report incidents of street racing, or call West Midlands Police on 101. In an emergency always dial 999.

## Supporting documents and evidence

You can find full details of the injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation below:

Supporting documents

You can download the documents below from the City of Wolverhampton Council's website.

1. [Power of arrest \(PDF 1.86KB\)](#)
2. [Sealed orders \(PDF 1.312KB\)](#)
3. [Orders of the High Court of Justice \(14 Nov 2022\) \(PDF 140KB\)](#)

## February 2025

64. [Bundle for Review Hearing \(26 February 2025\) Volume 1 of 2](#)
65. [Bundle for Review Hearing \(26 February 2025\) Volume 2 of 2 - Segment 001](#)
66. [Bundle for Review Hearing \(26 February 2025\) Volume 2 of 2 - Segment 002](#)

# Street racing

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## Injunction bans street racing in the Black Country

[The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.](#)

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Sandwell, Dudley, Walsall and Wolverhampton and has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it. Breach of an injunction is a contempt of court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

- "Burnouts" – causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed
- "Donuts/Donutting" – causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created
- "Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- "Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

The injunction and power of arrest were granted on Tuesday 27 February 2024 and will remain in force for a period of at least three years, and will be subject to an annual review.

The next hearing is scheduled to take place on 26 February 2025 at 10.30am at the High Court of Justice, King's Bench Division, Birmingham District Registry at Birmingham Civil and Family Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS. Defendants who wish to file any evidence in respect of the review hearing must do so by 7 February 2025.

Full details of the injunction, including evidence presented to the High Court, the sealed order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found on [our street racing downloads webpage](#).

Incidents of street racing should be [reported online to the council](#) or to West Midlands Police on **101**. In an emergency always dial **999**

<a href="#">Bundles for Car Cruising Review Hearing 26.02.25 (Volume 1 of 2)</a>	PDF	19.35M B	
<a href="#">Bundles for Car Cruising Review Hearing 26.02.25 (Volume 2 of 2) - Segment 1</a>	PDF	19.9MB	
<a href="#">Bundles For Car Cruising Review-Hearing 26.02.25- (Volume 2 of 2) - Segment 2</a>	PDF	19.27M B	
<a href="#">Bundles For Car Cruising Review Hearing-26.02.25-Volume (2 of 2) - Segment 3</a>	PDF	15.84M B	

## Car cruising injunction

### Injunction bans street racing in the Black Country

The High Court has granted a full and final injunction banning 'street racing', also known as 'car cruising', in the Black Country.

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It also covers organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it. Breach of an injunction is a contempt of court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

- "Burnouts" – causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed
- "Donuts/Donutting" – causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created
- "Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- "Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

The injunction and power of arrest were granted on Tuesday 27 February, 2024, will remain in force for a period of at least three years, and will be subject to an annual review.

The next hearing is scheduled to take place on 26 February 2025 at 10.30am at the High Court of Justice, King's Bench Division, Birmingham District Registry at Birmingham Civil and Family Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS. Defendants who wish to file any evidence in respect of the review hearing must do so by 7 February 2025.

Full details of the injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found in the downloads section of this page. Please note, this is in the process of being updated.

Incidents of street racing should be reported via [asbu@wolverhampton.gov.uk](mailto:asbu@wolverhampton.gov.uk) or to West Midlands Police on 101. In an emergency, always dial 999.

[Audio information about the interim street racing injunction application.](#)

The injunction is advertised by signs in key places on the highway, these signs can be seen in the Downloads section. Here you can find the locations of these signs. If signs are missing or damaged, please report this on 01902 551555 or Contact Roads.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

To contact the claimants, write to: FAD: Black Country Car Cruise, Legal Services, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton WV1 1RC. Alternatively, email [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk) or call 01902 556556.



### Downloads

Note: documents are linked from [Wolverhampton City Council - Order Banning Street Racing in the Black Country](#)

- [Bundle for Review Hearing \(26 February 2025\) volume 1 of 2](#)
- [Bundle for Review Hearing \(26 February 2025\) volume 2 of 2 segment 001](#)
- [Bundle for Review Hearing \(26 February 2025\) volume 2 of 2 segment 002](#)
- ['Chronicle' Evidence of Compliance with Order of 27 February 2024 Exhibit 3 April 2024 \(16.10.24\)](#)

Dudley Council street racing page

1) Claimant  
2) Paul Brown  
3) 22<sup>nd</sup>  
4) PB22B  
5) 24 February 2025

**IN THE HIGH COURT OF JUSTICE      CLAIM NO: KB-2022-BHM-000188**  
**KING'S BENCH DIVISION**  
**BIRMINGHAM DISTRICT REGISTRY**

**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- 4) PERSONS UNKNOWN AS DESCRIBED (IN THE INJUNCTION)**  
**(5) Mr ANTHONY PAUL GALE**  
**(6) Miss WIKTORIA SCZCUBLINSKA**  
**(7) Mr ISA IQBAL**  
**(8) Mr MASON PHELPS**  
**(9) Miss REBECCA RICHOLD**  
**(10) Mr OLIVER CLARKE**  
**(11) Mr SIKANDER HUSSAIN**  
**(12) Mr OMAR TAGON**  
**(13) Mr TY HARRIS**  
**(14) Mr VIVKASH BALI**

**Defendants**

---

**EXHIBIT PB22B**

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This is the document referred to in the Witness Statement of Paul Brown dated 24 February 2025 as "Exhibit PB22B."



## Street racing review hearing to be held next month

Released: Wednesday 29 January, 2025



The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025.

The injunction, led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council and supported by West Midlands Police, prohibits people from participating, as a driver, rider or passenger, in a gathering of two or more people where some of those present engage in car racing, vehicular stunts or other dangerous or obstructive driving.

It also prohibits people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone found to be breaching it will be in contempt of court and may be imprisoned, fined or have their assets seized. They may also be ordered to pay the council's legal costs of any hearing.

The High Court ordered that the injunction and power of arrest should remain in force until at least 2027 subject to annual review, with the next hearing taking place on Wednesday 26 February, 2025, at 10.30am at the High Court of Justice, King's Bench Division, Birmingham District Registry at Birmingham Civil and Family Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS.

Any existing defendants who wish to file any evidence in respect of the review hearing must do so by next Friday (7 February, 2025). To contact the claimants, write to: FAO: Black Country Car Cruise, Legal Services, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton WV1 1RG. Alternatively, email [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk) or call 01902 556556. Anyone wishing to be joined as a defendant to proceedings may apply to the High Court, as provided for by paragraph 11 of the injunction.

For more information, including a copy of the injunction and the power of arrest, the notice of review hearing, and updated documents and evidence for the review hearing, please visit the street racing pages of the applicants – Wolverhampton ([www.wolverhampton.gov.uk/street-racing-injunction](http://www.wolverhampton.gov.uk/street-racing-injunction)), Walsall, ([https://go.walsall.gov.uk/black country car cruising injunction](https://go.walsall.gov.uk/black_country_car_cruising_injunction)), Sandwell ([www.sandwell.gov.uk/streetracing](http://www.sandwell.gov.uk/streetracing)), or Dudley ([www.dudley.gov.uk/car-cruising-injunction](http://www.dudley.gov.uk/car-cruising-injunction)).

Incidents of street racing should be reported via [asbu@wolverhamptonhomes.org.uk](mailto:asbu@wolverhamptonhomes.org.uk) or to West Midlands Police on 101. In an emergency, always dial 999.

Police are also inviting members of the public to submit dash cam or mobile phone footage of street racing events or dangerous driving via its Op Snap website, <https://www.westmidlands.police.uk/police-forces/west-midlands-police/areas/campaigns/campaigns/operation-snap/>.

**ENDS**

**Notes to editors:**

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email [paul.brown@wolverhampton.gov.uk](mailto:paul.brown@wolverhampton.gov.uk).

- **Issued by the City of Wolverhampton Council’s Corporate Communications Team.**
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“Street racing review hearing to be held next month”

## Street racing review hearing to be held next month

HOME / NEWS / STREET RACING REVIEW HEARING TO BE HELD NEXT MONTH

The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025.

The injunction, led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council and supported by West Midlands Police, prohibits people from participating, as a driver, rider or passenger, in a gathering of 2 or more people where some of those present engage in car racing, vehicular stunts or other dangerous or obstructive driving.

It also prohibits people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

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The High Court ordered that the injunction and power of arrest should remain in force until at least 2027 subject to annual review, with the next hearing taking place on Wednesday 26 February, 2025, at 10.30am at the High Court of Justice, King's Bench Division, Birmingham District Registry at Birmingham Civil and Family Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS.

Any existing defendants who wish to file any evidence in respect of the review hearing must do so by next Friday (7 February, 2025). To contact the claimants, write to: FAO: Black Country Car Cruise, Legal Services, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton WV1 1RG. Alternatively, email [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk) or call 01902 556556. Anyone wishing to be joined as a defendant to proceedings may apply to the High Court, as provided for by paragraph 11 of the injunction.

For more information, including a copy of the injunction and the power of arrest, the notice of review hearing, and updated documents and evidence for the review hearing, please visit the street racing pages of the applicants - [Wolverhampton](#), [Walsall](#), [Sandwell](#), or [Dudley](#).

Incidents of street racing should be reported via [asbu@wolverhamptonhomes.org.uk](mailto:asbu@wolverhamptonhomes.org.uk) or to West Midlands Police on 101. In an emergency, always dial 999.

Police are also inviting members of the public to submit dash cam or mobile phone footage of street racing events or dangerous driving via its Op Snap [website](#).

Released: Wednesday 29th January, 2025



*The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025*

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LAST UPDATED

29 January 2025

# Street racing review hearing to be held next month

Published on 31 January 2025

Print

The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025.



Street racing banned in the Black Country

The injunction, led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council and supported by West Midlands Police, prohibits people from participating, as a driver, rider or passenger, in a gathering of two or more people where some of those present engage in car racing, vehicular stunts or other dangerous or obstructive driving.

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Walsall Council website

# STREET RACING BANNED IN THE BLACK COUNTRY

29 JAN 2025

finance and legal Cabinet - finance, legal and procurement

## Street racing review hearing to be held next month

The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025.

The injunction, led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council and supported by West Midlands Police, prohibits people from participating, as a driver, rider or passenger, in a gathering of two or more people where some of those present engage in car racing, vehicular stunts or other dangerous or obstructive driving.

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Dudley Council website

# Street racing review hearing to be held next month

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The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025.



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The injunction, led by the City of Wolverhampton Council on behalf of the Black Country councils and supported by West Midlands Police, prohibits people from participating, as a driver, rider or passenger, in a gathering of two or more people where some of those present engage in car racing, vehicular stunts or other dangerous or obstructive driving.

It also prohibits people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

The injunction covers the whole of the boroughs of Sandwell, Dudley, Walsall and Wolverhampton and anyone found to be breaching it will be in contempt of court and may be imprisoned, fined or have their assets seized. They may also be ordered to pay the council's legal costs of any hearing.

The High Court ordered that the injunction and power of arrest should remain in force until at least 2027 subject to annual review, with the next hearing taking place on Wednesday 26 February, 2025, at 10.30am at the High Court of Justice, King's Bench Division, Birmingham District Registry at Birmingham Civil and Family Justice Centre, The Priory Courts, 33 Bull Street, Birmingham B4 6DS.


Any existing defendants who wish to file any evidence in respect of the review hearing must do so by next Friday (7 February 2025). To contact the claimants, write to: FAO: Black Country Car Cruise, Legal Services, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton WV1 1RG. Alternatively, email [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk) or call 01902 556556. Anyone wishing to be joined as a defendant to proceedings may apply to the High Court, as provided for by paragraph 11 of the injunction.

For more information about the injunction, please visit the street racing injunction pages of the applicants:

- [Sandwell street racing webpage](#)
- [Dudley street racing webpage](#)
- [Walsall street racing webpage](#)
- [Wolverhampton street racing webpage](#)


[Incidents of street racing in Sandwell should be reported online to the council](#) or to West Midlands Police on 101. In an emergency, always dial 999.

Sandwell Council website



**Wolverhampton Today**  
 Published by Orlo  
 · 29 January at 12:45 · 🌐

The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025. Full story 📄  
<https://www.wolverhampton.gov.uk/.../street-racing-review...>

For more information, including documents and evidence for the review hearing, please visit the webpages of the applicants 📄 Wolverhampton (<https://www.wolverhampton.gov.uk/street-racing-injunction>), Walsall, (<https://orlo.uk/va5D0>), Sand... See more



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City of Wolverhampton Council Facebook


**Wolves Council**  
 @WolvesCouncil

The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 26 February, 2025. Full story 📄 [wolverhampton.gov.uk/news/street-ra...](https://www.wolverhampton.gov.uk/news/street-ra...) (1/2)  
[@sandwellcouncil](#) [@WalsallCouncil](#) [@dudleymbc](#) [@WMPolice](#)



12:45 PM · Jan 29, 2025 · **898** Views

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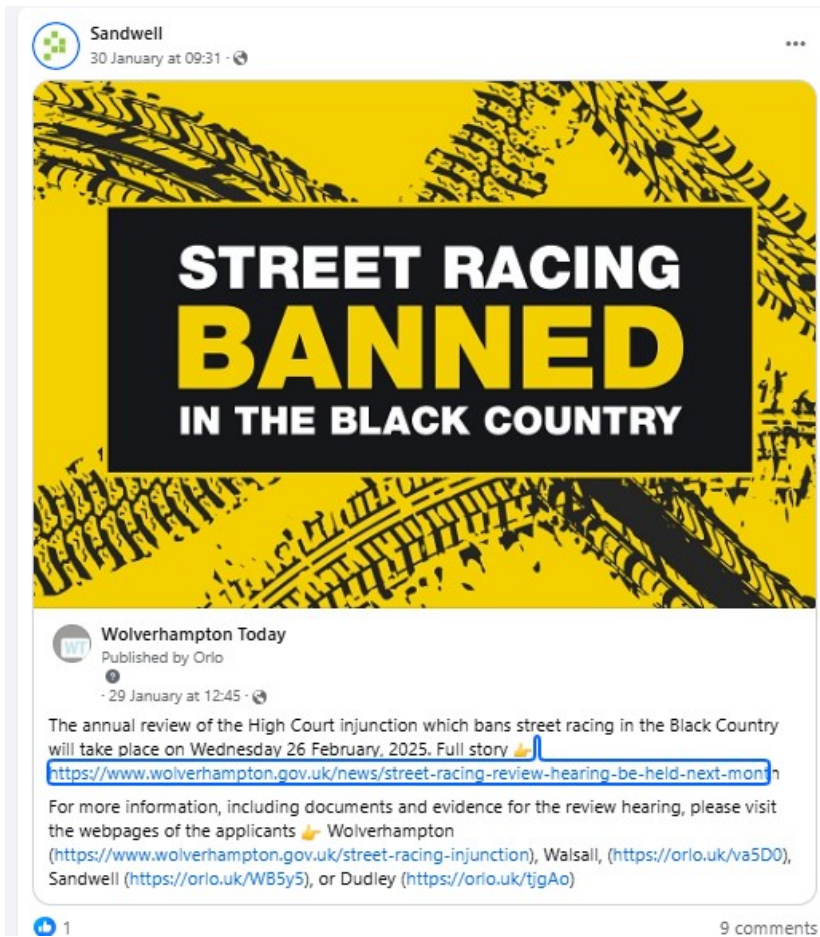


City of Wolverhampton Council X



Walsall Council X





Sandwell Council Facebook



Sandwell Council X

# Street racing injunction to be reviewed by High Court

## Local Government Lawyer

The High Court will next week conduct a review hearing of an injunction banning street racing in the Black Country.

The final injunction prohibits people from participating as a driver, rider or passenger, in a gathering of two or more people where some of those present engage in car racing, vehicular stunts or other dangerous or obstructive driving.

It was [granted in February 2024 following an application by the City of Wolverhampton Council](#) on behalf of Dudley Council, Sandwell Council and Walsall Council and supported by West Midlands Police.

The injunction also applies to organisers and spectators, prohibiting people from promoting, organising or publicising gatherings, or from participating in a gathering as a spectator with the intention or expectation that some of those present will engage in street racing.

According to Wolverhampton, numerous street racers have received civil penalties consisting of fines and suspended prison sentences for breaching the street racing injunction.

The injunction and power of arrest will remain in force until at least 2027 subject to annual review, with the next hearing scheduled to take place on 26 February 2025, at 10.30am at the High Court.

Cllr Obaida Ahmed, the City of Wolverhampton Council's Cabinet Member for Digital and Community, said: "Street racing is anti-social and highly dangerous – and has led to a number of incidents across the Black Country which have, tragically, caused fatalities and serious injuries.

"The injunction continues to have a positive effect on reducing instances of street racing, and we've seen the High Court hand down a series of jail sentences over the last few months which ought to prove a strong deterrent to anyone thinking of engaging in this irresponsible activity."

**Adam Carey**

Local Government Lawyer

## Drive safely for the ones you love

Sandwell Council is reminding drivers of the potential catastrophic consequences of driving dangerously.



The 'For The One I Love' campaign aims to bring home the terrible consequences for drivers, passengers and loved ones when things go wrong on the road.

The campaign is also raising awareness around the street racing ban that is currently in place in Sandwell and the wider Black Country.

The campaign specifically urges young adults to take responsibility for their passengers as well as themselves while driving. It encourages people to speak out if they find themselves in a situation where they feel uncomfortable as a car passenger.

As part of the campaign, on Valentine's Day (Friday 14 February) road safety officers from Sandwell Council set up a display of red roses at Sandwell College. Each red rose represented a young person aged 17 to 24 who was killed or seriously injured on the road in the West Midlands in 2023. Roses were distributed to students, with each rose bearing a label giving information about the campaign.

The campaign encourages young drivers to drive safely and responsibly within the speed limit as well as giving advice on the importance of wearing seatbelts.

[Click here to chat now](#)

Over the past 20 years, Sandwell has halved the number of casualties on its roads, including reducing child casualties by 67 per cent.

This big reduction follows a targeted programme of engineering and education measures, and supporting police enforcement action, all work which will continue to keep improving road safety.

Councillor Keith Allcock, Sandwell Council's Cabinet Member for Environment and Highways, said: "Road safety remains a top priority

for the council and our partner organisations. I welcome this campaign to raise greater awareness.

"We have made good progress over the past 20 years but I'm acutely aware there's more to do, and my heart goes out to anyone who has been seriously injured or lost a loved one on Sandwell's roads. My message to all drivers is to always take care, drive safely and think of the potential devastating consequences of their actions if they don't."

A High Court injunction order bans street racing in the Black Country, including Sandwell, and applies to drivers, riders, passengers, organisers and spectators.

Sandwell Council has successfully taken nine people to court for breaching the order by racing on Sandwell's streets, including seven on Kenrick Way, West Bromwich. All nine received suspended prison sentences. Street racing also invalidates a vehicle's insurance policy and police can seize and crush vehicles.

Councillor Suzanne Hartwell, Deputy Leader and Cabinet Member for Neighbourhoods and Community, said: "Street racing puts people's lives at risk and can have tragic consequences as we have sadly seen on Sandwell's roads. We continue to work closely with Sandwell Police and other councils to tackle dangerous and anti-social street racing."

Report street racing incidents to police on 101 or [report online to the council](#) – always call 999 in an emergency. [Go to our street racing webpage for the latest information.](#)

[The annual review of the High Court injunction which bans street racing in the Black Country will take place on Wednesday 28 February.](#)

Meanwhile, under the [Operation Snap initiative](#), police are asking people to submit footage of any dangerous driving. If you see anyone committing driving offences and it's captured on your dashcam, CCTV or a mobile phone by a passenger or pedestrian, you can now send it to the police.

Thursday, 20th February 2025

Sandwell Council

1) Claimant  
2) Paul Brown  
3) 22<sup>nd</sup>  
4) PB22C  
5) 24 February 2025

**IN THE HIGH COURT OF JUSTICE      CLAIM NO: KB-2022-BHM-000188**  
**KING'S BENCH DIVISION**  
**BIRMINGHAM DISTRICT REGISTRY**

**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- 4) PERSONS UNKNOWN AS DESCRIBED (IN THE INJUNCTION)**  
**(5) Mr ANTHONY PAUL GALE**  
**(6) Miss WIKTORIA SCZCUBLINSKA**  
**(7) Mr ISA IQBAL**  
**(8) Mr MASON PHELPS**  
**(9) Miss REBECCA RICHOLD**  
**(10) Mr OLIVER CLARKE**  
**(11) Mr SIKANDER HUSSAIN**  
**(12) Mr OMAR TAGON**  
**(13) Mr TY HARRIS**  
**(14) Mr VIVKASH BALI**  
**Defendants**

---

**EXHIBIT PB22C**

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This is the document referred to in the Witness Statement of Paul Brown dated 24 February 2025 as "Exhibit PB22C."

# Certificate of service

<b>Name of court</b> High Court of Justice King's Bench Division Birmingham District Registry	<b>Claim No.</b> KB-2022-BHM-000188
<b>Name of Claimant</b> Wolverhampton City Council, Dudley MBC, Sandwell MBC, Walsall MBC	
<b>Name of Defendant</b> PERSONS UNKNOWN & VARIOUS NAMED DEFENDANTS	

On what day did you serve?

The date of service is

**What documents did you serve?**  
*Please attach copies of the documents you have not already filed with the court.*

Bundles for Car Cruising Review Hearing 26.02.25 (Volume 1 of 2)

**On whom did you serve?**  
*(If appropriate include their position e.g. partner, director).*

Messrs Waldrons Solicitors (c/o Ms Amanda Jenkins) Solicitors to Mr Anthony Gale (5th Defendant); (c/o Ms Elle-May Macey) Solicitors to Mr Isa Iqbal (7th Defendant); (c/o Ms Amber Morrell) Solicitors to Mr Ty Harris and Mr Vivkash Bali (13th and 14th Defendants); Messrs Charles Strachan Solicitors (c/o Ms Mandy Edwards and Ms Olivia Stenton) Solicitors to Miss Wiktoria Szczublińska (6th Defendant); Mr Mason Mount (8th Defendant); Messrs McGrath & Co Solicitors (c/o Ms Georgina Ellis) Solicitors to Mr Oliver Clarke (10th Defendant); ; Messrs William Harringtons Legal LLP, Solicitors to Ms Rebecca Richold (9th Defendant), Mr Sikander Hussain (11th Defendant) and Mr Omar Tagon (12th Defendant).

**How did you serve the documents?**  
*(please tick the appropriate box)*

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) *(please specify)*
- by other means permitted by the court *(please specify)*
- by Document Exchange
- by fax machine (.....) time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- by other electronic means (15:47 hours) time sent, where document is other than a claim form) *(please specify)*

Email sent to william.harrington@harringtonslegal.co.uk et al. at 15:47 hours on 24 January 2025

**Give the address where service effected, include fax or DX number, e-mail address or other electronic identification**

Email sent to: william.harrington@harringtonslegal.co.uk;gellis@mcgrath.co.uk; amanda.jenkins@waldrons.co.uk; elle-may.macey@waldrons.co.uk; amber.morrell@waldrons.co.uk; olivia@charlesstrachan.com; mandy@charlesstrachan.com; masonhelpsb36@hotmail.co.uk

**Being the**  claimant's  defendant's  
 solicitor's  litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- other *(please specify)*

Defendants' Solicitors' E-mail addresses for service of the above documents on the 5th to 14th Defendants (and the 8th Defendant Mr Mason Phelps' personal e-mail address) .

**I believe that the facts stated in this certificate are true.**

I understand 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

Signed

On Behalf of the First Claimant's solicitors

Position or office held

(If signing on behalf of firm or company)

Date

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

**Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

**Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

# Certificate of service

<b>Name of court</b> High Court of Justice King's Bench Division Birmingham District Registry	<b>Claim No.</b> KB-2022-BHM-000188
<b>Name of Claimant</b> Wolverhampton City Council, Dudley MBC, Sandwell MBC, Walsall MBC	
<b>Name of Defendant</b> PERSONS UNKNOWN & VARIOUS NAMED DEFENDANTS	

On what day did you serve?

The date of service is

**What documents did you serve?**  
*Please attach copies of the documents you have not already filed with the court.*

Bundles for Car Cruising Review Hearing 26.02.25 (Volume 2 of 2)

**On whom did you serve?**  
*(If appropriate include their position e.g. partner, director).*

Messrs McGrath & Co Solicitors (c/o Ms Georgina Ellis) Solicitors to Mr Oliver Clarke (10th Defendant);

**How did you serve the documents?**  
*(please tick the appropriate box)*

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) *(please specify)*
- by other means permitted by the court *(please specify)*
- by Document Exchange
- by fax machine (.....) time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- by other electronic means (15:49 hrs) time sent, where document is other than a claim form) *(please specify)*  
gellis@mcgrath.co.uk, et al at 15:49 hours."/>

**Give the address where service effected, include fax or DX number, e-mail address or other electronic identification**

**Being the**  claimant's  defendant's  
 solicitor's  litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- other *(please specify)*

**I believe that the facts stated in this certificate are true.**

I understand 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

Signed   
On Behalf of the First Claimant's solicitors

Position or office held   
(If signing on behalf of firm or company)

Date

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Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.



# Certificate of service

<b>Name of court</b> High Court of Justice King's Bench Division Birmingham District Registry	<b>Claim No.</b> KB-2022-BHM-000188
<b>Name of Claimant</b> Wolverhampton City Council, Dudley MBC, Sandwell MBC, Walsall MBC	
<b>Name of Defendant</b> PERSONS UNKNOWN & VARIOUS NAMED DEFENDANTS	

On what day did you serve?

The date of service is

## What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

Link to view the Bundles for Car Cruising Review Hearing 26.02.25 (Volumes 1 and 2) - <https://www.wolverhampton.gov.uk/parking-and-roads/street-racing-injunction-application>

## On whom did you serve?

(If appropriate include their position e.g. partner, director).

Messrs Waldrons Solicitors (c/o Ms Amanda Jenkins) Solicitors to Mr Anthony Gale (5th Defendant); (c/o Ms Elle-May Macey) Solicitors to Mr Isa Iqbal (7th Defendant); (c/o Ms Amber Morrell) Solicitors to Mr Ty Harris and Mr Vivkash Bali (13th and 14th Defendants); Messrs Charles Strachan Solicitors (c/o Ms Mandy Edwards and Ms Olivia Stenton) Solicitors to Miss Wiktoria Szczublińska (6th Defendant); Mr Mason Mount (8th Defendant); Messrs William Harringtons Legal LLP, Solicitors to Ms Rebecca Richold (9th Defendant), Mr Sikander Hussain (11th Defendant) and Mr Omar Tagon (12th Defendant).

## How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....) time left, where document is other than a claim form) (please specify)

- by other means permitted by the court (please specify)

- by Document Exchange
- by fax machine (.....) time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
- by other electronic means ( 16:01 hours) time sent, where document is other than a claim form) (please specify)

Email to [Amber.Morrell@waldrons.co.uk](mailto:Amber.Morrell@waldrons.co.uk) et al at 16:01

## Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

[william.harrington@harringtonslegal.co.uk](mailto:william.harrington@harringtonslegal.co.uk);  
[amanda.jenkins@waldrons.co.uk](mailto:amanda.jenkins@waldrons.co.uk); [elle-may.macey@waldrons.co.uk](mailto:elle-may.macey@waldrons.co.uk);  
[amber.morrell@waldrons.co.uk](mailto:amber.morrell@waldrons.co.uk); [olivia@charlesstrachan.com](mailto:olivia@charlesstrachan.com);  
[mandy@charlesstrachan.com](mailto:mandy@charlesstrachan.com); [masonphelps36@hotmail.co.uk](mailto:masonphelps36@hotmail.co.uk)

- Being the  claimant's  defendant's  
 solicitor's  litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- other (please specify)

Defendants' Solicitors' Email addresses for service for the above documents and the 8<sup>th</sup> Defendant, Mr Mason Phelps' personal email address.

## I believe that the facts stated in this certificate are true.

I understand 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

Signed

On Behalf of the First Claimant's solicitors

Position or office held

(If signing on behalf of firm or company)

Date

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

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Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

1) Claimant  
2) T Philpot  
3) First  
4) TP1  
5) February 2025

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
BIRMINGHAM DISTRICT REGISTRY**

**CLAIM NO: KB-2022-BHM-  
000188**

**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- 4) PERSONS UNKNOWN AS DESCRIBED (IN THE INJUNCTION)  
(5) Mr ANTHONY PAUL GALE  
(6) Miss WIKTORIA SCZCUBLINSKA  
(7) Mr ISA IQBAL  
(8) Mr MASON PHELPS  
(9) Miss REBECCA RICHOLD  
(10) Mr OLIVER CLARKE  
(11) Mr SIKANDER HUSSAIN  
(12) Mr OMAR TAGON  
(13) Mr TY HARRIS  
(14) Mr VIVKASH BALI**

**Defendants**

---

**WITNESS STATEMENT OF TIM PHILPOT**

---

I, Tim Philpot of Wolverhampton City Council, will say as follows:

1. I am employed by Wolverhampton City Council as a Service Lead for Transport Strategy and I am based at the Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG.
2. I make this statement further to my signage inspection report of 6 December 2024 which appears at pages B53-B60 of volume 1 of the bundle of documents before the Court for the Court's consideration at the Review Hearing (review of the Black Country Car Cruising Injunction) listed 26 February 2025 at 10.30 a.m. at the Birmingham District Registry of the High Court.

3. My signage inspection report of 6 December 2024 detailed the results of the inspection of signage (foamex signs fastened to lampposts and the like by cable tie, and metal signs) installed by Wolverhampton City Council in various locations throughout the City informing road users that a High Court injunction restraining car cruising was in effect.
4. My signage inspection report of 6 December 2024 revealed that the following signs informing road users of that an injunction restraining car cruising was in effect which should have been erected and visible, were missing and damaged and required replacement:
  - Location 9, Black Country Route at Lunt Island, metal sign partly detached and twisted around
  - Location 15, Springvale Avenue lamp column 22, foamex sign faded
  - Location 16, Springvale Way lamp column 25, foamex sign faded
5. Replacements for the above signs were ordered shortly after completion of my signage inspection report. These replacement signs were re-installed at the following locations:
  - Location 9, metal sign re-installed 14/02/25
  - Location 15, foamex sign replaced 14/02/25
  - Location 16, foamex sign replaced 14/02/25
6. I exhibit hereto, marked as “**EXHIBIT TP1**”, photographs taken at 13.48 hours and 14.10 hours on 14 February 2025 showing freshly installed signs at the locations referred to in paragraph 4 above.

## **STATEMENT OF TRUTH**

**I believe that the facts stated in this witness statement are true I understand 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.**

Signed:



Print name: Tim Philpot

Position Held: Service Lead, Transport Strategy

Dated: 20 February 2025.

1) Claimant  
2) T Philpot  
3) First  
4) TP1  
5) February 2025

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
BIRMINGHAM DISTRICT REGISTRY**

**CLAIM NO: KB-2022-BHM-000188**

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

**(5) WOLVERHAMPTON CITY COUNCIL  
(6) DUDLEY METROPOLITAN BOROUGH COUNCIL  
(7) SANDWELL METROPOLITAN BOROUGH COUNCIL  
(8) WALSALL METROPOLITAN BOROUGH COUNCIL**

**Claimants**

**and**

**(2- 4) PERSONS UNKNOWN AS DESCRIBED (IN THE INJUNCTION)**

**(5) Mr ANTHONY PAUL GALE**

**(6) Miss WIKTORIA SZCZUBLINSKA**

**(7) Mr ISA IQBAL**

**(8) Mr MASON PHELPS**

**(9) Miss REBECCA RICHOLD**

**(10) Mr OLIVER CLARKE**

**(11) Mr SIKANDER HUSSAIN**

**(12) Mr OMAR TAGON**

**(13) Mr TY HARRIS**

**(14) Mr VIVKASH BALI**

**Defendants**

---

**EXHIBIT TP1**

---

This is the document referred to as "Exhibit TP1" in the witness statement of Tim Philpot dated 20 February 2025.

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PHOTOGRAPHS OF CAR CRUISING INJUNCTION SIGNS  
REPLACED IN WOLVERHAMPTON 14 FEBRUARY 2025

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Location 9 - Black Country Route at Lunt Island



Location 15 - Springvale Avenue lamp column 22



Location 16 - Springvale Way lamp column 25

