Party: Witness: Statement: Exhibits:

Date:

Claimant S Wortley Fourth None 18.01.24

Claim Number: QB 2020 002072

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BETWEEN

- (1) MULTIPLEX CONSTRUCTION EUROPE LIMITED
- (2) LUDGATE HOUSE LIMITED (INCORPORATED IN JERSEY)
- (3) SAMPSON HOUSE LIMITED (INCORPORATED IN JERSEY)

Claimants

and

PERSONS UNKNOWN ENTERING IN OR REMAINING AT THE CLAIMANTS' CONSTRUCTION SITE AT BANKSIDE YARDS WITHOUT THE CLAIMANT'S PERMISSION

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

- I, STUART SHERBROOKE WORTLEY of 50/60 Station Road, Cambridge CB1 2JH WILL SAY as follows:-
- I am a solicitor of the Senior Courts of England and Wales and have conduct of these proceedings on behalf of the Claimants.
- 2. Paragraph 5 of the Order of Mrs Justice Jefford dated 22 December 2023 required that copies of an approved form warning notice be posted:-
 - 2.1 at all main entrances to the Bankside Yards construction site;
 - 2.2 at a minimum of 10 prominent locations around the perimeter of the Bankside Yards construction site;

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3. Paragraphs 6 and 7 of the Order required that:-

3.1 the warning notice refer to the Court papers, evidence and various orders

and to state that these can be viewed at:-

3.1.1 a website identified in the warning notice;

3.1.2 a physical location identified in the warning notice.

3.2 digital copies of the said documents be uploaded to the website;

3.3 hard copies of the said documents be kept at a physical location;

3.4 copies of the said documents may be obtained from the Claimants'

solicitor.

4. The said documents have been duly uploaded to the following website:-

https://www.multiplex.global/uk/news/london-injunction-bankside-yards/

5. I am informed by Jamie Godden, the Deputy Project Director of the First Claimant

and believe that approved form warning notice was duly posted at all main

entrances and at 10 prominent locations around the perimeter on 22 December

2023.

6. I am informed by Mr Godden that there have been no incidents of trespass at the

Bankside Yards construction site since the Order of Mrs Justice Jefford.

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.

I am duly authorised to make this statement on behalf of the Claimants.

Stuart Sherbrooke Wortley

18 January 2024