

N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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Name of court High Court of Justice King's Bench Division Royal Courts of Justice		Claim no. QB 2020-002702
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
	H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>	
Warrant no. (if applicable)		
Claimant's name (including ref.) (1) Multiplex Construction Europe Ltd (2) Ludgate House Limited (Incorporated in Jersey) (3) Sampson House Limited (Incorporated in Jersey) Ref: 133198.00006		
Defendant's name (including ref.) Persons Unknown entering in or remaining at the Claimants' construction site at Bankside Yards without the Claimants' permission		
Date		

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

CMS Cameron McKenna Nabarro Olswang LLP

2. Are you a ☒ Claimant ☐ Defendant ☒ Legal Representative
☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimants

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

The Claimants are seeking the following as per the attached Order:

Summary judgment on the Claimants' claim, pursuant to CPR Part 24, and a final injunction to be granted until the end of 2026 in line with the witness evidence.

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing
☐ at a remote hearing

6. How long do you think the hearing will last? 2.5 Hours Minutes
 Is this time estimate agreed by all parties? ☐ Yes ☒ No

7. Give details of any fixed trial date or period N/A

8. What level of Judge does your hearing need? Judge

9. Who should be served with this application?

The Defendants

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

10. What information will you be relying on, in support of your application?

- ☒ the attached witness statement
- ☐ the statement of case
- ☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

Please see attached the Third Witness Statement of Martin Philip Wilshire dated 12 February 2025.

The Claimants are applying for summary judgment, pursuant to CPR Part 24 because they believe the Defendants have no real prospect of succeeding on the defence or issue to be determined. The Claimants know of no reason why the disposal of the claim should await trial. For the avoidance of doubt, the Defendants have the right to rely on evidence opposing the application.

The Defendants have not participated in these proceedings to date nor have they filed an Acknowledgment of Service or Defence.

Permission to bring this application was granted by the Order of Mr Justice Ritchie dated 5 February 2025.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☒ No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- ☐ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.
- ☒ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

12

Month

02

Year

2025

Full name

Emma Margaretha Florence Pinkerton

Name of applicant's legal representative's firm

CMS Cameron McKenna Nabarro Olswang LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

2 College Square

Second line of address

Anchor Road

Town or city

Bristol

County (optional)

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Postcode

B	S	1	5	U	E		
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If applicable

Phone number

+442073672065

Fax phone number

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DX number

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Your Ref.

EMPI/133198.00006

Email

emma.pinkerton@cms-cmno.com
