

N244

# Application notice

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

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<b>Name of court</b> High Court of Justice  King's Bench Division Royal Courts of Justice		<b>Claim no.</b> QB-2020-002702
<b>Fee account no.</b> (if applicable)	<b>Help with Fees – Ref. no.</b> (if applicable) <b>H W F</b> - <input type="text"/> - <input type="text"/>	
<b>Warrant no.</b> (if applicable)		
<b>Claimant's name</b> (including ref.) (1) Multiplex Construction Europe Ltd (2) Ludgate House Limited (Incorporated in Jersey) (3) Sampson House Limited (Incorporated in Jersey)  (Ref: 133198.00006)		
<b>Defendant's name</b> (including ref.) Persons Unknown entering in or remaining at the Claimants' construction site at Bankside Yards without the Claimants' permission  QB-2020-002702 Sub Event ID: 41		
<b>Date</b>		

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?

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

We seek the following orders:-  
 (1) The Order of Mr Justice Ritchie granting an injunction dated 19 January 2024 be extended to 30 April 2026;  
 (2) Permission to amend the Particulars of Claim in accordance with the attached draft be granted pursuant to CPR Rule 17.1(1) (b);  
 (3) To dispense with the need to serve the Amended Particulars of Claim and Order for the reasons given in the First Witness Statement of Emma Margaretha Florence Pinkerton;  
 (4) For this matter to be dealt with on paper for the reasons set out in the witness statement of Emma Margaretha Florence Pinkerton or, in the alternative, if the Court considers that a hearing is required, a hearing to be listed on the first available date and, until the hearing of the Claimants' application or further order, the Defendants continue to be prohibited from entering or remaining, without the Claimants' consent, upon any part of the The Bankside Yards Construction Site as per the Order of Mr Justice Ritchie dated 19 January 2024.

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?

 Hours Minutes

Is this time estimate agreed by all parties?

 Yes No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

See Draft Order

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

N/A

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.

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.

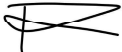
No

## 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	Month	Year
20	12	2024

### 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

Solicitor

Applicant's address to which documents should be sent.

Building and street

2 College Square

Second line of address

Town or city

Bristol

County (optional)

Postcode

B S 1 5 U E

If applicable

Phone number

+44 (0)20 7367 2065

Fax phone number

DX number

Your Ref.

ALMZ/EMPI/133198.00006

Email