N244

Application notice

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

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Name of court	**Claim no.**
High Court of Justice King's Bench Division Royal Courts of Justice	QB-2020-002702
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
PBA0088890	H W F - -
Warrant no. (if applicable)	

Claimant's name (including ref.)

Multiplex Construction Europe Limited of Aldgate Tower, First Floor, 2 Leman Street, London E1 8FA

Ludgate House Limited (incorporated in Jersey) of 47 Esplanade, St Helier, Jersey JE1 0BD

Sampson House Limited (incorporated in Jersey)of 47 Esplanade, St Helier, Jersey JE1 0BD

Ref: ALMZ/EMPI/NM 3009.80007

HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION 12 Oct 2026

QB-2020-002702

Sub Event ID: 60

Defendant's name (including ref.)

Persons Unknown entering and climbing in or remaining and climbing at the Claimants' construction site at Bankside Yard 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 enclosed draft order:

(1) to discharge the interim injunction granted on 28 February 2025 by Order of the Hon Mrs Justice Ellenbogen DBE sitting in the Royal Courts of Justice (the "Order") because the purpose of the injunction has been fulfilled and the continuation of the injunction is no longer proportionate;

(2) to release the First Claimant from its undertaking to pay any damages which the Defendants (or any other party served with or notified of the Order) could have sustained as a result of the injunction;

(3) permission to discontinue the claim;

(4) for this matter to be dealt with on paper for the reasons set out in the enclosed witness statement of Emma Margaret Florence Pinkerton or, in the alternative, if the Court considers that a hearing is required, a hearing to be listed on the first

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available date.

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?

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

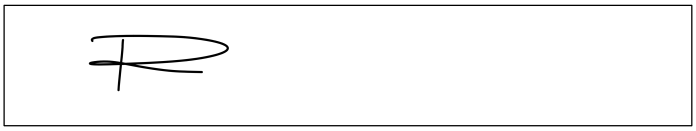
Statement of Truth

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
12	10	2026

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

Anchor Road

Town or city

Bristol

County (optional)

Postcode

B S 2 1 6 F Z

If applicable

Phone number

+44 (0)20 7367 20 65

Fax phone number

DX number

Your Ref.

ALMZ/EMPI/NM3009. 00097

Email