

Party: Claimants
Witness: M Waters
Statement: Second
Exhibits: None
Date: 28.07.23

Claim Number: KB-2023-002914

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

- (1) ELEPHANT AND CASTLE PROPERTIES CO. LIMITED
- (2) ELEPHANT AND CASTLE 990 UNI CO LIMITED
- (2) MULTIPLEX CONSTRUCTION EUROPE LIMITED

Claimants

and

PERSONS UNKNOWN ENTERING OR REMAINING AT
THE CONSTRUCTION SITE AT ELEPHANT & CASTLE
SE1 6TE WITHOUT THE CLAIMANTS' PERMISSION

Defendants

WITNESS STATEMENT OF

MICHAEL WATERS

I, MICHAEL WATERS of Multiplex Site Office, Newington Butts, London SE1 6TJ WILL SAY as follows:-

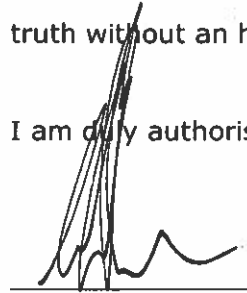
1. I make this witness statement to correct errors (for which I apologise) in my first witness statement dated 14 July 2023.
2. In paragraph 1 of my first witness statement, it is the Third (not the Second) Claimant which is carrying out the construction work. I should also have recorded in this paragraph that I am employed by the Third Claimant.

3. In paragraph 26, I intended to say that I was authorised on behalf of the Third (not the First) Claimant to provide the cross-undertaking.
4. The quotation included at paragraph 27 is taken from the accounts for the Third (not the Second) Claimant.

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.



Michael Waters

28 July 2023