

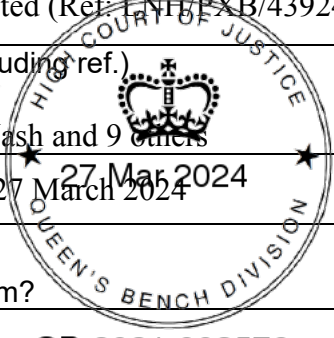
Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

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Name of court High Court of Justice King's Bench Division		Claim no. QB-2021-003576								
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)									
PBA:0087960	<table border="1"> <tr> <td>H</td> <td>W</td> <td>F</td> <td>-</td> <td></td> <td>-</td> <td></td> <td></td> </tr> </table>		H	W	F	-		-		
H	W	F	-		-					
Warrant no. (if applicable)										
Claimant's name (including ref.) National Highways Limited (Ref: LNH/PXB/439241/15)										
Defendant's name (including ref.) (1) Persons Unknown (2) Catherine Rennie - Nash and 9 others										
Date	27 March 2024									



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

DLA Piper UK LLP QB-2021-003576

2. Are you a Claimant Defendant Legal Representative Sub Event ID: 1181

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?

An order in the form of the draft order attached seeking, inter alia:

- 1) a continuation of the final injunction imposed by the Order of Mr Justice Cotter dated 5 May 2023 (“**Original Cotter Order**”) (as amended by Mr Justice Cotter by further Orders dated 24 July 2023 and 3 October 2023) (“**Cotter Injunction**”) for a further 2 years until 23.59 hrs on 10 May 2026;
- 2) permission to amend the Schedule of Named Defendants to the Cotter Injunction; and
- 3) that the Court list this matter for a review hearing in April 2026 on a half day estimate at the Royal Courts of Justice, London to determine whether there is a continued threat which justifies a further continuation of the Cotter Injunction.

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

6. How long do you think the hearing will last? Day

Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period

26 April 2024 at 10.30 am (Note – this matter has currently been listed by the Court for 1 hour only)

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

(1) Persons Unknown
(2) Catherine Rennie - Nash and 9 others

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

The Claimant will deal with effecting service of this Application on the Defendants in accordance with the terms of the Cotter Order.

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 the attached witness statement of Sean Martell with exhibits.

Statement of Truth

The applicant believes that the facts stated in this section (and any continuation sheets) are true. The applicant understands 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.

Signed *DLA Piper UK LLP*
Applicant's legal representative

Dated **27 March 2024**

Full name: Petra Billing

Name of applicant's legal representative's firm: **DLA Piper UK LLP**

Position or office held: Partner/ Solicitor
(if signing on behalf of firm or company)

11. Signature and address details

Signed *DLA Piper UK LLP*
Applicant's legal representative

Dated **27 March 2024**

Position or office held: Partner/ Solicitor
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

DLA Piper UK LLP
1 St. Paul's Place

If applicable	
Phone no.	0114 283 3312

Sheffield		Fax no.		N/A	
		DX no.		DX 708580 Sheffield 10	
Postcode		Ref no.		LNH/PXB/439241/15	
		S	1	2	J X
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