


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, Chancery Division, Business and Property Court, Leeds District Registry		Claim no.	
Fee account no. (if applicable)		Help with Fees (if applicable)	
PBA0087876		 Ref. no. 04 Jun 2025	
Warrant no. (if applicable)		H W F - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>	
Claimant's name (including ref.) See attached sheet KB-2025-LDS-000078			
Defendant's name (including ref.) See attached sheet			
Date			

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

Simmons & Simmons 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?

An injunction preventing Persons Unknown, without the consent of the Claimants, from entering, occupying or remaining upon the Land (as defined in the Particulars of Claim) and preventing, slowing down or otherwise interfering with the access or egress of any individual or vehicle to or from, the Land.

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
- N/a
8. What level of Judge does your hearing need?
- High Court Judge
9. Who should be served with this application?
- N/a
- 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

0 4

Month

0 6

Year

2 0 2 5

Full name

Robert Allen

Name of applicant's legal representative's firm

Simmons & Simmons 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

Citypoint 1 Ropemaker Street

Second line of address

Town or city

London

County (optional)

Postcode

E	C	2	Y	9	S	S
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If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

robert.allen@simmons-simmons.com

Continuation sheet: N244 application form

Claimant's name

- (1) Sheffield Environmental Services Limited
- (2) Veolia ES Sheffield Limited
- (3) Veolia ES (UK) Limited

Defendant's name

Persons Unknown who, in connection with strikes organised by UNITE the Union and without the Claimants' consent, enter occupy or remain on, or prevent slow down or otherwise interfere with the access or egress of any other individual or vehicle to or from, the following sites:

- (a) Lumley Street Depot, Lumley Street, Sheffield, S4 7ZJ (as shown for identification edged red on the attached Plan 1)
- (b) Lumley Street Workshop, Lumley Street, Sheffield, S4 7ZJ (as shown for identification edged red on the attached Plan 2)
- (c) The Energy Recovery Facility at Bernard Road, Sheffield, S4 7YX (as shown for identification edged red but excluding that area of land shaded purple on the attached Plan 3)
- (d) Land at 93 Tinsley Park Road, Sheffield, S9 5DL (as shown for identification edged red on the attached Plan 4)
- (e) Land at Crown Works, Rotherham Road, Beighton, Sheffield, S20 1AH (as shown for identification edged red on the attached Plan 5)