

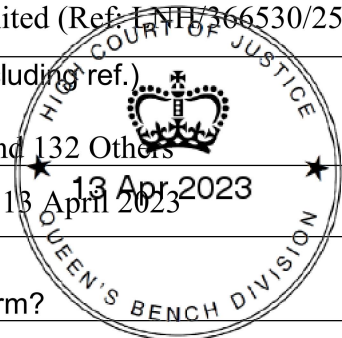
# Application notice

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

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<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

<b>Name of court</b> High Court of Justice King's Bench Division		<b>Claim no.</b> QB-2021-003576, 003626 and 003737
<b>Fee account no.</b> (if applicable)	<b>Help with Fees – Ref. no.</b> (if applicable)	
PBA:0087960	H W F - [ ] [ ] - [ ] [ ]	
<b>Warrant no.</b> (if applicable)		
<b>Claimant's name</b> (including ref.) National Highways Limited (Ref: LNH/266530/250)		
<b>Defendant's name</b> (including ref.) (1) Persons Unknown (2) Alexander Rogers and 132 Others		
<b>Date</b>	13 April 2023	



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: 881

Other (please specify) [ ]

If you are a legal representative whom do you represent? Claimant

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

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

- 1) a continuation of the final injunction imposed by the Order of Mr Justice Bennathan dated 09.05.2022 (the “**Bennathan Order**”), as amended by the Court of Appeal on 14 March 2023, for a further 12 months;
- 2) to vary those provisions of the Bennathan Order that currently provide for service by alternative means; and
- 3) to amend the Schedule of Named Defendants to the Bennathan Order.

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? 1 Day  
Is this time estimate agreed by all parties?  Yes  No

7. Give details of any fixed trial date or period 24 April 2023

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application?

(1) Persons Unknown  
(2) Alexander Rogers and 132 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.

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 statements of Sean Martell and Laura Higson.

**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  Dated **13 April 2023**  
Applicant's legal representative

Full name: Laura Natasha Higson

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

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

11. Signature and address details

Signed  Dated **13 April 2023**  
Applicant's legal representative

Position or office held: **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 Sheffield		If applicable	
		Phone no.	0114 283 3312
		Fax no.	
		DX no.	DX 708580 Sheffield 10
		Ref no.	LNH/366530/250
Postcode	<input type="text"/> <input type="text"/> S 1 <input type="text"/> <input type="text"/> 2 J X <input type="text"/>		
E-mail address	rob.shaw@dlapiper.com / laura.higson@dlapiper.com		