

- i) Statement of: Paul Brown
- ii) Statement No: 24
- iii) For: Claimant
- iv) Dated: 15.05.2025
- v) Exhibits: PB23A

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO: KB-2022-BHM-000188

B E T W E E N:

- 1. **WOLVERHAMPTON CITY COUNCIL**
 - 2. **DUDLEY METROPOLITAN BOROUGH COUNCIL**
 - 3. **SANDWELL METROPOLITAN BOROUGH COUNCIL**
 - 4. **WALSALL METROPOLITAN BOROUGH COUNCIL**
- Claimants**

and

- 1 to 4. **PERSONS UNKNOWN (AS DESCRIBED IN THE INJUNCTION)**
- 5. **Mr ANTHONY PAUL GALE**
- 6. **Miss WIKTORIA SCZCUBLINSKA**
- 7. **Mr ISA IQBAL**
- 8. **Mr MASON PHELPS**
- 9. **Miss REBECCA RICHOLD**
- 10. **Mr OLIVER CLARKE**
- 11. **Mr SIKANDER HUSSAIN**
- 12. **Mr OMAR TAGON**
- 13. **Mr TY HARRIS**
- 14. **Mr VIVKASH BALI**
- 15. **Mr Qamar Hussain**
- 16. **Mr Scott Hill**

Defendants

TWENTY FOURTH WITNESS STATEMENT OF PAUL STEVEN BROWN

I, PAUL STEVEN BROWN of the City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

- 1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my 24th statement in these proceedings.

2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the “Black Country Boroughs”) seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs. This is a statement on behalf of all four Claimants.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, after this was granted, to promote the existence of the injunction and the Power of Arrest which is in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police.
6. Since my previous statement of 25 March 2025, the Claimants have made two relief from sanctions applications. These were determined and approved by the courts on consecutive days, 29 April and 30 April 2025.
7. To serve these orders on Persons Unknown, the Claimants were ordered to repeat the steps in paragraphs (2), (3), (4) and (5) of the directions order of 3 March (corrected 7 March), with service to be effected by a number of steps. These were:
8. *Placing on the Claimants’ social media including X, Facebook and Instagram links to the above media release by 16:00 hours on 06 May 2025.*

I can confirm that social media posts were issued by the City of Wolverhampton Council as claimant council on 02 May 2025. Please see links to these posts:

<https://x.com/WolvesCouncil/status/1918241499134779814>

<https://www.facebook.com/photo/?fbid=1024199866479455&set=a.448694034030044>

<https://www.instagram.com/p/DJHYNPsras/>

Social media was shared by the other Claimant Councils and by West Midlands Police.

9. *Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the Injunction and Power of Arrest and this Order:*

<https://www.wolverhampton.gov.uk/street-racing-injunction>

<https://www.dudley.gov.uk/residents/parking-and-roads/roadshighways-andpavements/car-cruising-injunction>

https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing

https://go.walsall.gov.uk/black_country_car_cruising_injunction

Such pages shall carry a direct link to this Order by 16:00 hours on 06 May 2025.

I can confirm that the webpages were updated as follows: City of Wolverhampton Council, 10.35am on 02 May 2025, Walsall Council, morning of 02 May 2025, and Sandwell Council, 4.30pm on 30 April 2025. Dudley Council's dedicated webpage links directly to the City of Wolverhampton Council's dedicated webpage where all documentation is made available, and confirmed this was the case on the afternoon of 30 April, 2025.

10. *Ensuring that the home (or landing) page of each of the Claimants' main websites have and retain a prominent direct link to the dedicated webpages referred to above by 16:00 hours on 06 May 2025.*

Following a visual check of each homepage on the morning of 06 May 2025 and again on the morning of 14 May 2025, I can confirm that each Claimant Council homepage contains a direct link to the dedicated street racing webpages.

11. Ensuring that copies of this Order are available at the front desks of the Claimants' main offices by 16:00 hours on 06 May 2025.

I can confirm that bundles were updated as follows: City of Wolverhampton Council, 10.35am on 02 May 2025, Walsall Council, morning of 02 May 2025, Sandwell Council, 4.30pm on 30 April 2025, Dudley Council, afternoon of 30 April, 2025. Order granting relief from sanctions made by HHJ Emma Kelly made on 30 April 2025, required the Claimants to complete a series of steps before 23:59 on 21 March 2025 to publicise the outcome of the hearing and bring it to the attention of "Persons Unknown".

12. The Court may also wish to know that the media release was issued by the City of Wolverhampton Council on 02 May 2025 detailing the street racing ban, the power of arrest and the date for the next review hearing in February 2026. This was published on Claimant Council websites and social media channels as the basis of the communications referred to in paragraph 8 above: <https://www.wolverhampton.gov.uk/news/would-be-street-racers-warned-consequences-breaching-ban>.

13. Based on the above I would humbly submit that the Claimants have fully complied with the requirements of the orders of the High Court made on 29 and 30 April 2025.

14. I will continue to ensure future steps in the Communications Plan are acted upon at the relevant time and will continue to liaise with my counterparts in Communications Teams of Dudley, Sandwell and Walsall Councils and West Midlands Police to ensure that they are disseminating the information as and when necessary.

STATEMENT OF TRUTH

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 and honest belief in its truth.

Full Name: PAUL STEVEN BROWN
Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed: *Paul Brown*

Print Name: PAUL BROWN

Dated: 15 May 2025