

i) Statement of: Paul Brown  
ii) Statement No: 6  
iii) For: Claimants  
iv) Dated: 3.2.2023  
v) Exhibits: -

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

**CLAIM NO: KB-2022-BHM000188**

**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. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF  
3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN  
THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT  
WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR  
MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

**2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF  
3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN  
THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE  
INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL  
ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS  
OR OBSTRUCTIVE DRIVING**

**3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY  
MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF  
3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR  
EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR  
RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE  
DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A  
(ATTACHED)**

**Defendants**

---

**SIXTH 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 third 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.
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, with the initial steps implemented, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally 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. The order of the High Court made by the Honourable Mrs Justice Hill on 22 December 2022, required the Claimants to file and serve the following evidence:

*(1) Data analytics of the Claimants' web pages and social media posts used by the Claimants to effect service of the documents referred to at paras 2(2), (4) and (5) of the Order of Judge Emma Kelly dated 14 December 2022; demonstrating, where possible, how many hits each page/post has received.*

*(2) Evidence of a like nature in relation to the Claimants' web pages and social media*

7. I can report that social media messaging around the application for and subsequent granting of the interim injunction shared by the City of Wolverhampton Council between 15th and 23rd December 2022 reached a total of 322,631 people and received 15,893 engagements. The breakdown between platforms is as follows - Facebook, 288,214 reach, 15,517 engagements; Twitter 45,287 reach, 387 engagements; Instagram 7,631 reach, 102 engagements.

8. Social media messaging around the introduction of the interim injunction and subsequent application for a full injunction in February 2023 from 24th December 2022 to the present day has reached a total of 276,284 people and received 10,315 engagements. The breakdown between platforms is as follows - Facebook, 240,464 reach, 9,858 engagements; Twitter 27,527 reach, 287 engagements; Instagram 8,293 reach, 170 engagements.

9. The other applicant councils primarily shared the social media posted by the City of Wolverhampton Council and therefore their reach and engagement are largely captured in the above. However, in the instances where the other applicants posted messages natively via their own channels, I can report that Walsall Council's social media messaging reached 3,503 people between 15th and 23rd December 2022, and 3,333 people from 24th December 2022 to the present day, and Dudley Council's social media messaging reached 1,733 people between 15th and 23rd December 2022, and 6,209 people from 24th December to the present day. Sandwell Council only shared the City of Wolverhampton Council's posts, which was entirely acceptable.

10. The YouTube videos hosted on the City of Wolverhampton Council's YouTube channel have been watched a total of 311 times (initial video posted 22nd December 2022, 209 views, updated video posted 26th January 2023, 102 views). Please note, these are only views by people who have visited YouTube to watch the video. It does not include views either through social media or the claimants' webpages, which are likely to have been numerous.

11. The City of Wolverhampton Council's street racing injunction webpage received 317 page views from 15th December to 23rd December 2022 and 422 page views from 24th December 2022 to the present day.

12. Sandwell Council's street racing injunction webpage received 145 page views from 15th December to 23rd December 2022 and 231 page views from 24th December 2022 to the present day.

13. Dudley Council's street racing injunction webpage received 37 page views from 15th December to 23rd December 2022 and 159 page views from 24th December 2022 to the present day.

14. Walsall Council's street racing injunction webpage received 136 page views from 15th December to 23rd December 2022 and 317 page views from 24th December 2022 to the present day.

15. The Court may also wish to know that the City of Wolverhampton Council shared street racing information in some of its weekly residents' e-newsletter, which reaches approximately 18,000 people, and that Sandwell Council shared street racing information in some of its weekly e-newsletters, which are sent to approximately 30,000 people per bulletin, depending on categories selected for the e-newsletter.

16. 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**

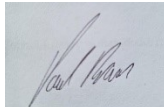
I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed

A small rectangular box containing a handwritten signature in dark ink, which appears to read 'Paul Brown'.

Print Name PAUL BROWN

Dated: 3 February 2023