

i) Statement of: Paul Brown  
ii) Statement No: 11  
iii) For: Claimants  
iv) Dated: 17.5.2023  
v) Exhibits: PB11A

**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**

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**ELEVENTH WITNESS STATEMENT OF PAUL STEVEN BROWN**

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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. This is my 11th statement within these proceedings.
6. I make this statement to update the Court on the measures taken to notify people of the vacation of the review hearing of 15 May 2023 and its relisting for 19 May 2023.
7. The Claimants were notified that the hearing of 15 May had been vacated at around 3.00 p.m. on 12 May 2023.

8. A media release was issued early evening on 12 May 2023 to publicise the new date issued to relevant print publications including the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart; the website Birmingham Live (aka) BLive; and TV stations BBC Midlands Today and ITV Central. Please see **“ExhibitPB10A” attached hereto which refers** and also includes coverage in the Express & Star, as well as screengrabs of the news items on each Claimant’s website, where the news story was also posted.
9. The street racing pages of the Claimants’ websites were updated on 12 May 2023 with the new notice of hearing and the new hearing date.

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

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

[https://www.sandwell.gov.uk/info/200284/roads\\_travel\\_and\\_parking/3231/street\\_racing](https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing)

[https://go.walsall.gov.uk/black\\_country\\_car\\_cruising\\_injunction](https://go.walsall.gov.uk/black_country_car_cruising_injunction)

Please see **“ExhibitPB11A” attached hereto which refers** and also includes screengrabs from each of the above webpages.

10. Information about the change of hearing date was shared on social media by all four claimants between 12 May 2023 and 15 May 2023. Please see **“ExhibitPB11A” attached hereto which refers** and also includes screengrabs from the social media channels of the four claimants.
11. Further, a request was made to West Midlands Police on 12 May to share information via its social media channels. This was complied with – please see **“ExhibitPB11A” attached hereto which refers** and includes screengrabs from the social media channels of West Midlands Police, Wolverhampton Police, Walsall Police, Sandwell Police and Dudley Police.
12. The Court may wish to know that social media issued by the City of Wolverhampton Council via Facebook, Twitter and Instagram reached an audience in excess of 93,000 people from 12 May onwards. Please see **“Exhibit**

**PB11A” attached hereto which refers** and includes a graph showing a noticeable spike in the reach of posts relating to street racing on the council's social media feeds between these dates.

13. The new notice of hearing was printed and placed in the existing bundle of documents relating to the review hearing and injunction which are maintained at the front desks of the offices of the four claimants for public inspection.

14. For the above reasons stated reasons, I believe that notice of the change in date of the review hearing from 15 May 2023 to 19 May 2023 has been brought to the attention of the public at large, and in particular, those likely to be affected by this application, or those engaging, looking to engage, or likely to engage, in the behaviour prohibited by this application and the interim injunction if granted.

15. 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**

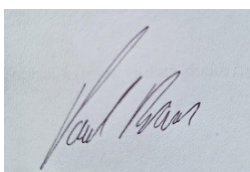
I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed

A rectangular box containing a handwritten signature in dark ink. The signature appears to be 'Paul Brown' written in a cursive, stylized script.

Print Name PAUL BROWN

Dated: 17 May 2023