

INJUNCTION

Between

- (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

To:	1. Persons Unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more
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IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

Claim no:

KB-2022-BHM-000188



Claimants

**WOLVERHAMPTON CITY
COUNCIL & OTHERS**

<p>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</p> <p>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</p> <p>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)</p>		<p>Defendants</p> <p>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</p> <p>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</p> <p>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)</p>
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PENAL NOTICE

IF YOU THE WITHIN NAMED PERSONS, INCLUDING PERSONS UNKNOWN, DO NOT COMPLY WITH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND IMPRISONED OR FINED, OR YOUR ASSETS MAY BE SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS ANY OF THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN

CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order but you must obey the order unless it is varied or discharged by the Court.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

This Order was made when the Defendants were not present at court but informal notice of the Claimants application had been given

Before the Honourable Mrs Justice Hill sitting at, the Royal Courts of Justice, Strand, London, WC2A 2LL on 20 and 21 December 2022

Upon hearing Mr Singleton of counsel for the Claimants and without notice to the Defendants, but on informal notice having been given to the Defendants;

UPON the Claimants' applications, by

- (1) an Application Notice dated 7 October 2022 for an injunction pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980; and
- (2) a further Application Notice, dated 13 December 2022, seeking urgent without notice interim relief.

AND UPON the Court exercising its discretion to grant injunctive relief pursuant to section 37(1) Senior Courts Act 1981;

AND UPON the Court being satisfied for the purposes of s.27(3), Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from the conduct prohibited by this Order and that a power of arrest should therefore be granted.

AND UPON the Court noting the order of Her Honour Judge Emma Kelly, sitting as a judge of the High Court, made on 14 December 2022 giving directions and approving service by alternative means pursuant to CPR r. 6.15 and r. 6.27 Claimants' Claim Form, Applications and the evidence in support.

And UPON it appearing to the court that there is good reason to authorise service by a method or place not otherwise permitted by CPR Parts 6 & 81

AND UPON the Claimants confirming that this Order is not intended to prohibit lawful motorsport taking place on private land where planning permission has been granted and such activities take place under an approved code or licence from a recognised regulatory body.

IT IS ORDERED THAT:

Injunction in force

- 1 IT IS FORBIDDEN** for any Defendant being a driver, rider or passenger in or on a motor vehicle to 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.

Stunts are driving manoeuvres often undertaken at such gatherings including but not limited to:

- (1) “Burnouts” Causing a vehicle to damage or destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
 - (2) “Donuts/Donutting” Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving off causing noise, smoke and tyre marks to be created.
 - (3) “Drifting” Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
 - (4) “Undertaking” passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code
- 2** A Power of Arrest pursuant to section 27 Police and Criminal Justice Act 2006 shall apply to paragraph 1 of this Order.

Definitions

- 3** In this Order the following definitions have been applied:

- (1) “the Injunction” means this Order
- (2) “the Power of Arrest” means the sealed Power of Arrest
- (3) “the Interim Relief Application” - the Application Notice of 13 December 2022, including the draft Injunction Order referred to therein.
- (4) “the Alternative Service Application” – the Application Notice of 7 October 2022, seeking permission for alternative service of Claim Form.
- (5) “the Applications” – the Interim Relief Application, the Alternative Service Application and the application for a final injunction issued on 13 October 2022.
- (6) “the Documents”
 - (a) Notice of Hearing and a sealed copy of this Order
 - (b) Part 8 Claim Form;
 - (c) Particulars of Claim
 - (d) N16A application for an Injunction;
 - (e) Draft Injunction Order
 - (f) Draft Power of Arrest
 - (g) The Interim Relief Application;
 - (h) The Alternative Service Application.
- (7) “the Evidence” materials set out at Schedule A below
- (8) “the Claimants’ contact details”:

FAO: Black Country Car Cruise

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG
E: litigation@wolverhampton.gov.uk T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/LIJ017753P

Directions for Service

4 Pursuant to CPR r. 6.15 and r.6.27, the steps that the Claimants have taken in compliance with the Order of Her Honour Judge Emma Kelly, sitting as a judge of the High Court, made on 14 December 2022 to serve the Claim Form, the Applications and the Evidence in support on the Defendants shall amount to good and proper service of the proceedings on the Defendants and each of them.

5 Personal service on the Defendants pursuant to CPR r. 6.27 & r. 81.4 the Claimants have permission to serve the Injunction and Power of Arrest on the Defendants by the alternative means set out at paragraphs 5(1) to 5(9) below

(1) Issuing a media release highlighting the application for and granting of the High Court injunction and Power of Arrest on an urgent without notice basis

Such release must provide:

- (a) Details of the application and summarise the orders granted;
- (b) Any deadline for filing an acknowledgement of service or other documents by the Defendants;
- (c) The date, time and location of any future hearings
- (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (e) The Claimants' contact details;
- (f) Details of where and how copies of the Injunction, Power of Arrest, the Documents and the Evidence may be obtained.

Such release shall be made to, but is not limited to, local 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 the following television stations, BBC (to include the Midlands Today programme) and ITV Central.

by 23:59 on 23 December 2022

(2) Placing on the Claimants' social media including Twitter, Facebook and Instagram links to the above media release regarding the granting of the High Court injunction

and power of arrest and highlighting introduction of injunction and power of arrest by 23:59 on 23 December 2022.

- (3) 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 date of introduction of the injunction at the following webpages:

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

Such pages shall carry a direct link to this Injunction Order, the Power of Arrest, the Documents and the Evidence and be updated by 23:59 on 23 December 2022.

- (4) Ensuring that the home (or landing) page of each of the Claimants' main websites has a prominent direct link to the dedicated webpages referred to above 23:59 on 23 December 2022.
- (5) Ensuring that copies of the Injunction and Power of Arrest are available at the front desks of the Claimants' main offices by 23:59 on 23 December 2022
- (6) Placing a copy of the Injunction and Power of Arrest (by Public Notice) in the Express & Star newspaper in the next available edition following the grant of this order. Such notice to be commissioned as soon as possible.
- (7) Uploading to the video sharing website "You Tube" and the Claimants' websites and social media pages to include Instagram, Twitter and Facebook, a video of someone presenting and reciting a copy of the terms of the Injunction with a stark warning that should people be participate in car cruising in the Black Country they may be in breach of the Injunction and liable to committal proceedings for contempt of court which could result in the court imposing: a sentence of imprisonment; a fine; or an order seizing a person's assets. The video shall also outline:
 - (a) The deadline for filing an acknowledgement of service or any other documents by any Defendant;

- (b) The date, time and location of the next hearing of the application;
- (c) The Claimant's contact details;
- (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (e) Details of where and how copies of the Injunction the Power of Arrest, Documents and the Evidence may be obtained.

Items (c) and (d) shall appear on screen as text.

The video shall be uploaded by 23:59 on 23 December 2022

- (8) Causing to be displayed at regular intervals on the Claimants' electronic road signage the words "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA"; or words to the same effect and thereafter

Erecting and maintaining official road signs (fixed, and temporary) throughout the Black Country Area in locations that are, or have been, hotspots car cruising activity stating "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA";

The electronic signage to be activated by 00:01 on 24 December 2022 and other signage by 23:59 on 20 January 2023.

- (9) The Claimants shall request that West Midlands Police:
 - (a) post on their website and Instagram, Twitter, and Facebook accounts, a link to the media release
 - (b) ensure that copies of the Injunction and Power of Arrest are available at the front desks of their stations throughout the Black Country Area.

Such requests to be made by 23:59 on 23 December 2022

- 6 The Injunction, Power of Arrest, Documents and any further evidence (see paragraphs 9 and 12) shall be deemed served on the Defendants at 23.59 on the date upon which, in each case, the final step in paragraphs 5, 9 and 12 have been complied with.

- 7 The Claimants shall file a witness statement confirming that the steps taken to effect service set out at paragraph 5, within 7 days of the final step being taken. If paragraph 5 has not been fully complied with the Claimants shall identify the deficiency and provide an explanation so that a judge may consider whether to authorise retrospective alternative service, pursuant to CPR r. 6.27 & r. 81.4.
- 8 Any person who wishes to appear at the hearing referred to at paragraph 11 below must file and serve on the Claimants an Acknowledgment of Service no later than 7 days before the hearing referred to at paragraph 11 below.
- 9 The Claimants may file and serve any updating evidence no later than 7 days before the hearing referred to at paragraph 11 below.

Commencement, Term and Duration

- 10 This Order and attached Power of Arrest shall come into force at **00.01 on 24 December 2022** and remain in force until the hearing of the claim unless varied or discharged by further Order of the Court.
- 11 This Order and attached Power of Arrest shall, be reconsidered at a further hearing at a time to be fixed on a **date to be confirmed between 1 February 2023 and 10 February 2023** at the Birmingham Civil Justice Centre, Priory Law Courts, 33 Bull Street, Birmingham B4 6DS before a Judge of the High Court with a time estimate of 1 day. This case shall be listed alongside, but not consolidated with the case of *Birmingham City Council & others v Persons Unknown* - KB-2022-BHM-000221.

- 12 Further, the Claimants shall file and serve, not less than 7 days before the return date, 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 used by the Claimants to effect service of this Order and the attached Power of Arrest;
 - (3) Evidence of the steps that the Claimants have taken to notify persons against whom enforcement proceedings were taken in relation to the Injunction and Power of Arrest prohibiting street cruising granted by HHJ Owen QC on 1 December 2014 and renewed by HHJ McKenna on 9 January 2018 in *Wolverhampton & Others v Persons Unknown* [2014] (Claim No A90BM228) which was in effect from 2 February 2015 until 1 February 2021.
- 13 Service of updating evidence referred to at paragraph 9 above and data analytics evidence referred to at paragraph 12 may be effected by:
- (1) updating the dedicated pages of the websites of the Claimants referred to at paragraph 5(3) above) by adding a direct link to copies of the witness statements referred to; and ensuring that copies of the updating evidence are available at the front desks of the Claimants' main offices within the times prescribed by paragraphs 9 and 12.

14 Costs in the case

Further Case Management

- 15 Without prejudice to the foregoing, any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants'

solicitors immediately (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below. Schedule B to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule C.

- 16 Any person applying to vary or discharge this Order must provide their full name and address, an address for service, and must also apply to be joined as a Named Defendant to the proceedings at the same time.
- 17 The Claimants otherwise have permission to apply to extend or vary this Order or for further directions.

Documents in the Claim and Application

- 18 A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

Communications with Claimants and the Court

- 19 All communications to the Court about this Order (which should quote the case number) should be sent to:

Birmingham District Registry Civil Justice Centre
Priory Courts
33 Bull Street

Birmingham B4 6DW

E: qb.birmingham@justice.gov.uk T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

20 Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below

21 The Claimants' solicitors and their contact details are:

FAO: Black Country Car Cruise
Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

E: litigation@wolverhampton.gov.uk
T: T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/LIJ017753P

Dated: 22 December 2022

SCHEDULE A

Please see:

- (1) Attached Index to Bundle for Injunction Application (Parts B, C, D, E, F and G).
- (2) Attached Index to Supplemental Bundle for Injunction Application

SCHEDULE B – STEPS TO VARY OR DISCHARGE THIS ORDER

If any Defendant or any other person affected by this Order wishes to apply to vary or discharge this Order, to ensure effective case management by the Court the following indicative steps must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

- (a) An N244 application form¹;
- (b) Written grounds (which may be contained in within the N244 application form or a separate document) for:
 - i. permission to bring the application; and
 - ii. the application (i.e. reasons for the proposed variation / discharge of the Order).
- (c) A witness statement(s) containing and/or appending all of the evidence to be relied upon in support of the application.

2. In order to file the above documents with the Court, the applicant should:

- (a) Send physical copies of the documents to the address at paragraph 19 of this Order; and/or
- (b) Speak to the Court to obtain an address to send electronic copies of the documents to.

3. In order to serve the above documents on the Claimants, the applicant should:

- (a) Send physical copies of the documents to the address at paragraph 21 of this Order; and/or
- (b) Send electronic copies of the documents to the e-mail address at paragraph 21 above.

4. The person making the application should indicate to the Court and Claimants whether they consider the matter requires a court hearing or can be dealt with by the judge reviewing the paper application and any response from the Claimants.

5. Thereafter the Claimants shall have 14 days to file and serve evidence and submissions in response, including as to whether an oral hearing is required to determine the application.

6. Within 21 days, the Court shall decide:

- a whether to grant permission for the application to proceed; and
- b if permission is granted, whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the Court decides that a hearing is necessary, it shall seek to schedule the hearing (accommodating availabilities of the parties) within 42 days (6 weeks).

¹ 1 See the following link which provides a digital version of the form, and guidance notes:
<https://www.gov.uk/government/publications/form-n244-application-notice>

7. If the Court decides that further evidence is needed from any party, it may set strict deadlines by which that evidence must be filed. Both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

SCHEDULE C – USEFUL REFERENCES AND RESOURCES

The attention of all parties is drawn to the following references and resources:

Bar Pro Bono Unit – A possible avenue for obtaining free legal advice and/or representation:

<https://weareadvocate.org.uk/>

Support Through Court (formerly Personal Support Unit) – An organisation supporting litigants in person:

<https://www.supportthroughcourt.org>

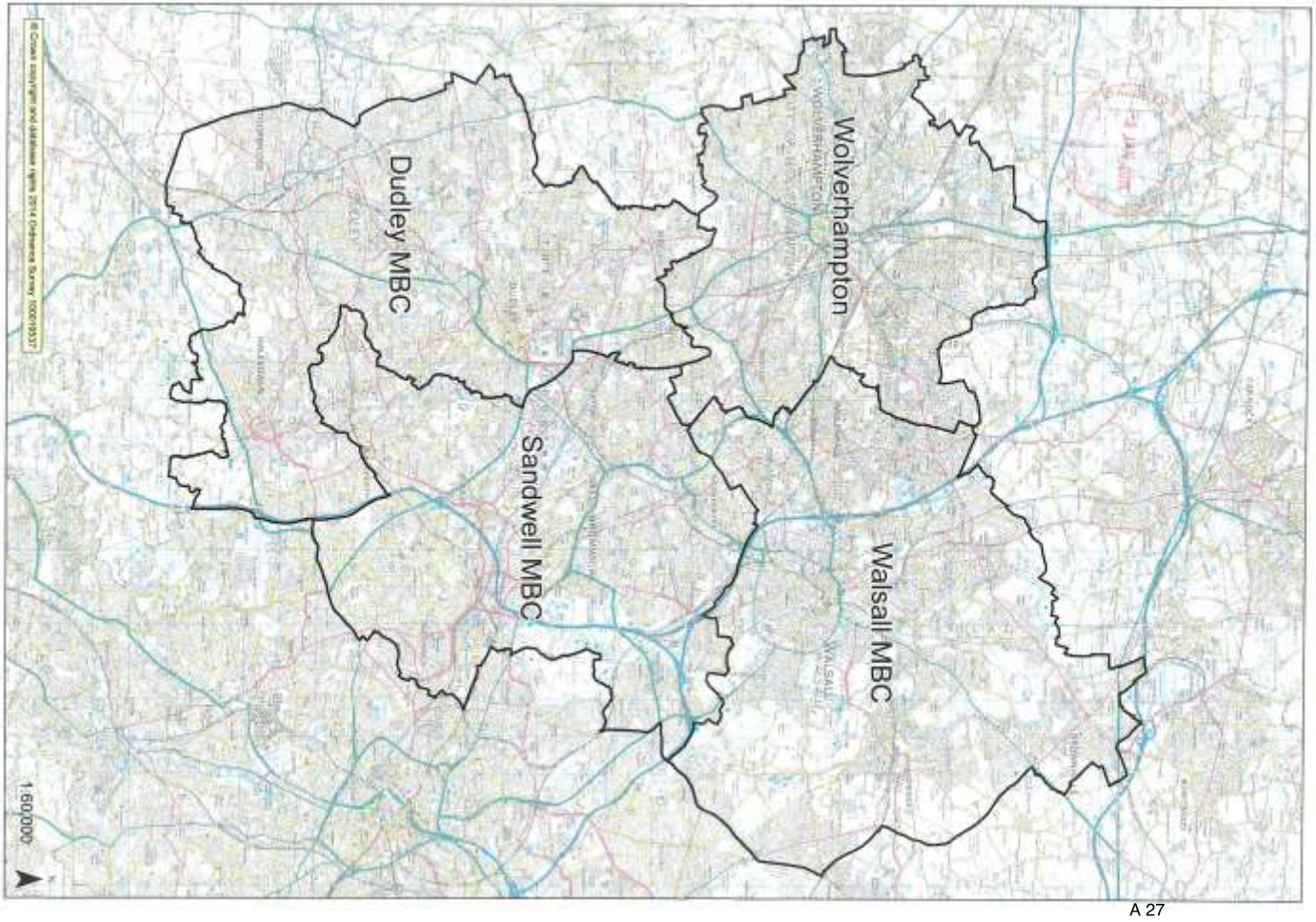
King’s Bench Division Guide: <https://www.judiciary.uk/guidance-and-resources/kings-bench-division-guide-2022-2/>

A Handbook for for Litigants in Person: <https://www.judiciary.uk/guidance-and-resources/handbook-litigants-person-civil-221013>

Civil Procedure Rules Part 8: <https://www.justice.gov.uk/courts/procedure/civil/rules/part08>

Help with Court Fees website: <https://www.gov.uk/get-help-with-court-fees>

PLAN A



A 27

SCHEDULE A

A. SECTION A - STATEMENTS OF CASE

B. SECTION B - Global Overarching Statements

1.	Statement of Adam Sheen 4 October 2022	B 1 - B 3
2.	Overarching Statement of Pardip Nagra (For Wolverhampton) 19 July 2022	B 4 - B 35
3.	EXHIBIT PN1	B 36
4.	Exhibit PN1 - Statement of Lisa Fox (From 2014 Application) 02 11 2013	B 37 - B 40
5.	EXHIBIT PN2	B 41
6.	Exhibit PN2 - Statement of Peter James (From 2014 Application) 09 11 2013	B 42 - B 44
7.	EXHIBIT PN3	B 45
8.	Exhibit PN3 - Statement of Carl Yeomans (From 2014 Application) 07 11 2013	B 46 - B 49
9.	EXHIBIT PN4	B 50
10.	Exhibit PN4 - Statements of David Clark (From 2014 Application) 12 03 2014	B 51 - B 70
11.	EXHIBIT PN5	B 71
12.	Exhibit PN5 - Statement of Lisa Parmar (From 2014 Application) 22 05 2014	B 72 - B 88
13.	EXHIBIT PN6	B 89
14.	Exhibit PN6 - Statement of Lydia Pulford (From 2014 Application) 11 11 2013	B 90 - B 92
15.	EXHIBIT PN7	B 93
16.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 94 - B 95
17.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 96
18.	EXHIBIT PN8	B 97
19.	Exhibit PN8 - Statement of PC J Hartford (From 2014 Application) 16 11 2013	B 98 - B 99
20.	EXHIBIT PN9	B 100
21.	Exhibit PN9 - Statement of Richard Hardy (From 2014 Application) 06 11 2013	B 101 - B 103
22.	EXHIBIT PN10	B 104
23.	Exhibit PN10 - Statement of Police Inspector Julie Mason (From 2014 Application) 23 07 2014	B 105 - B 109
24.	EXHIBIT PN11 - (Video Footage Available Separately)	B 110
25.	EXHIBIT PN12	B 111
26.	Exhibit PN12 - E-mail from Lisa Fox 17 April 2021	B 112
27.	EXHIBIT PN13	B 113
28.	Exhibit PN13 - Express & Star Article 12 04 22 direct print from Website	B 114 - B 126
29.	Exhibit PN13 Print Friendly Version of E & S Article 12 04 2022	B 127 - B 129
30.	EXHIBIT PN14	B 130
31.	Exhibit PN14 - Letter from Councillor Leach to Wolverhampton ASB Team 05 22	B 131
32.	EXHIBIT PN15	B 132
33.	Exhibit PN15 - Letter from Pat McFadden MP 31 05 22	B 133
34.	EXHIBIT PN16	B 134
35.	Exhibit PN16 - Letter From Nicola Richards MP 25 04 22	B 135
36.	EXHIBIT PN17	B 136

37.	Exhibit PN17 - Version 1 Print Friendly Version of story published on E & S Website 15 08 2018	B 137 - B 142
38.	Exhibit PN17 Version 2 print from E & S Website 15 08 2018	B 143 - B 160
39.	EXHIBIT PN18	B 161
40.	Exhibit PN18 - Essex Live Article 5 April 2021 (Print Friendly Version)	B 162 - B 164
41.	Exhibit PN18 - Essex Live News 5 April 2021 - Report of Thurrock Car Meet From Essex News Website	B 165 - B 170
42.	EXHIBIT PN19	B 171
43.	Exhibit PN19 - Media release July 2022	B 172 - B 173
44.	Overarching Statement of Chief Superintendent Ian Green (West Midlands Police) 19 07 22	B 174 - B 176
45.	Overarching Statement of PC Mark Campbell (West Midlands Police) 15 07 22	B 177 - B 213
46.	EXHIBIT MRC1 - Video Footage (Available Separately)	B 214
47.	EXHIBIT MRC2 - Video Footage (Available Separately)	B 215
48.	EXHIBIT MRC3	B 216
49.	Exhibit MRC3 - Statement of PC Mark Campbell 13 July 2022	B 217 - B 224
50.	Witness Statement of Paul Brown (Communications Manager) (For Wolverhampton) 16 September 2022	B 225 - B 227
51.	STREET RACING COMMUNICATIONS PLAN (FINAL VERSION) FOR BUNDLE	B 228 - B 236
52.	Comms Plan Appendix 1	B 237
53.	Comms Plan - APPENDIX 1	B 238 - B 239
54.	Comms Plan Appendix 2	B 240
55.	Comms Plan - APPENDIX 2	B 241 - B 242
56.	Comms Plan Appendix 3	B 243
57.	Comms Plan - APPENDIX 3	B 244 - B 245
58.	Comms Plan Appendix 4	B 246
59.	Comms Plan - APPENDIX 4	B 247 - B 248
60.	Comms Plan Appendix 5	B 249
61.	Comms Plan - APPENDIX 5	B 250 - B 251
62.	Comms Plan Appendix 6	B 252
63.	Comms Plan - APPENDIX 6	B 253
64.	Comms Plan Appendix 7	B 254
65.	Comms Plan - APPENDIX 7	B 255 - B 257
66.	Comms Plan Appendix 8	B 258
67.	Comms Plan - APPENDIX 8	B 259 - B 260
68.	Comms Plan Appendix 9	B 261
69.	Comms Plan - APPENDIX 9	B 262 - B 264
70.	Comms Plan Appendix 10	B 265
71.	Comms Plan - APPENDIX 10	B 266 - B 267
72.	Comms Plan Appendix 11	B 268
73.	Comms Plan - APPENDIX 11	B 269 - B 270

74.	Comms Plan Appendix 12	B 271
75.	Comms Plan - APPENDIX 12	B 272 - B 273
76.	Comms Plan Appendix 13 -	B 274
77.	Comms Plan - APPENDIX 13	B 275 - B 276
78.	Comms Plan Appendix 14	B 277
79.	Comms Plan - APPENDIX 14	B 278 - B 279
80.	Comms Plan Appendix 15	B 280
81.	Comms Plan - APPENDIX 15	B 281 - B 282
82.	Comms Plan Appendix: "Digital Signage"	B 283
83.	Comms Plan - APPENDIX DIGITAL SIGNAGE	B 284 - B 288
84.	Comms Plan Appendix "Signage 1"	B 289
85.	Comms Plan - Appendix signage 1 - Dudley Existing Signs	B 290
86.	Comms Plan Appendix "Signage 2"	B 291
87.	Comms Plan - Appendix signage 2 - Dudley Existing and Proposed Signs	B 292 - B 295
88.	Comms Plan Appendix "Signage 3"	B 296
89.	Comms Plan - Appendix Signage 3	B 297 - B 299
90.	Comms Plan Appendix "Signage 4"	B 300
91.	Comms Plan Appendix "Signage 5"	B 301
92.	Comms Plan - Appendix signage 5 - Walsall Existing Signs	B 302
93.	Comms Plan Appendix "Signage 6"	B 303
94.	Comms Plan - Appendix signage 6 - Walsall Existing and Proposed Signs	B 304 - B 306
95.	Comms Plan Appendix "Signage 7"	B 307
96.	Comms Plan - Appendix signage 7 - Wolverhampton Existing Signs	B 308 - B 317
97.	Comms Plan Appendix "Signage 8"	B 318
98.	Comms Plan - Appendix signage 8 - Wolverhampton Existing and Proposed Signs	B 319 - B 322

C. SECTIONC- Overarching Statements of Professionals for Each Claimant Local Authority

1.	Statement of Kathryn Jones 13 07 22 (For Dudley)	C 1 - C 5
2.	Witness Statement of Pardip Sandhu 27 September 2022	C 6 - C 12
3.	Exhibit Cover - Exhibit PS1 (Pardip Sandhu 27.9.2022)	C 13
4.	Exhibi PS1 To Statement of Pardip Sandhu 2022 car crusing incidents 2021 - 2022 with date of incidents	C 14 - C 36
5.	Exhibit Cover - Exhibit PS2 (Pardip Sandhu 27.9.2022)	C 37
6.	Statement of Steve Gittins 08 09 22 (For Walsall)	C 38 - C 44
7.	Exhibit Cover SJG1	C 45
8.	Exhibit SJG1 [Steve Gittins] (For Walsall)	C 46
9.	Exhibit Cover SJG2	C 47
10.	Exhibit SJG2 [Steve Gittins] (For Walsall)	C 48
11.	Exhibit Cover SJG3	C 49
12.	Exhibit SJG3 [Steve Gittins] (For Walsall)	C 50 - C 51

13.	Statement of Police Sergeant Lee Plant 15 07 22 (For Wolverhampton)	C 52 - C 53
14.	(MG11 Format) Police Sergeant Lee Plant Street racing - Wolverhampton	C 54 - C 74
15.	Statement of Police Constable Jonathan Edwards 12 05 22 (For Dudley)	C 75 - C 86
16.	Statement of Police Sergeant Richard Phillips 29 06 22 (For Sandwell)	C 87 - C 90
17.	Statement Police Inspector Phil Upton 09 06 22 (For Walsall)	C 91 - C 93
18.	Second Statement of Police Inspector Phil Upton 04 09 22 (For Walsall)	C 94 - C 104

D. SECTION D - Statements of Councillors, MPs, Residents and Business for Wolverhampton

1.	Witness Statement of Dharminster Dhaliwal (Wolverhampton) Tier 3	D 1 - D 2
2.	Witness Statement of Margaret Clemson (Wolverhampton) Tier 3	D 3 - D 4
3.	Witness Statement of Nicki Wellings (Wolverhampton) Tier 3	D 5
4.	Witness Statement of Taylor Harvey-Beardsmore (Wolverhampton) Tier 3	D 6
5.	Witness Statement of Teja Sidhu (Wolverhampton) Tier 3	D 7
6.	Witness Statement of Teresa Welburn (Wolverhampton) Tier 3	D 8
7.	Witness statement of Jennifer Bateman 26.05.22 (For Wolverhampton)	D 9 - D 12

E. SECTION E- Statements of Councillors, MPs, Residents and Business for Dudley

1.	Signed statement of James Morris MP (For Dudley)	E 1 - E 6
2.	Statement of Stacy Hewerdine - Waterfront Security 10-05-22 (For Dudley)	E 7 - E 12
3.	Exhibit Cover - EXHIBIT SH1 [Stacy Hewedine] (For Dudley) (Clearer Version of Exhibit SH1)	E 13
4.	EXHIBIT SH1 (Waterfront Car Park) [Stacy Hewerdine] (For Dudley) (Clearer Version)	E 14
5.	Signed statement of Richard Hubbard- Harris - Showcase 10-05-22 (For Dudley)	E 15 - E 22
6.	Exhibit Cover RHH1 [Richard Hubbard-Harris] (For Dudley) (Clearer Version of Exhibit RHH1)	E 23
7.	EXHIBIT RHH1 Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 24
8.	EXHIBIT RHH1 Front Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 25
9.	EXHIBIT RHH1 Rear Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 26
10.	Signed 2nd stmt of Richard Hubbard-Harris dated 14-09-22	E 27 - E 33
11.	Exhibit RHH2 - (Video Footage Available Separately)	E 34
12.	Exhibit RHH3 - Cover Sheet	E 35
13.	EXHIBIT RHH3	E 36 - E 40
14.	Exhibit RHH4 - Cover Sheet	E 41
15.	EXHIBIT RHH4	E 42
16.	Exhibit RHH5 - Cover Sheet	E 43
17.	EXHIBIT RHH5	E 44
18.	Exhibit RHH6 - Cover Sheet	E 45
19.	EXHIBIT RHH6	E 46 - E 47

20.	Exhibit RHH7- Cover Sheet	E 48
21.	EXHIBIT RHH7	E 49
22.	Exhibit RHH8 - Cover Sheet	E 50
23.	EXHIBIT RHH8	E 51
24.	Signed statement of John Slater-Kiernan - Shell Garage 11-05-22 (For Dudley)	E 52 - E 56
25.	Exhibit Cover JSK1 [John Slater-Kiernan] (For Dudley)	E 57
26.	Statement of Chris Southall - Tesco 11-05-22 (For Dudley)	E 58 - E 62

F. SECTION F - Statements of Councillors, MPs, Residents and Business for Sandwell

1.	Letter from Nicola Richards MP 25 04 22	F 1
2.	Witness Statement of Donata Halasa (Sandwell) 10 06 22	F 2 - F 3
3.	Witness Statement of John Gallagher (Sandwell) 31 05 22	F 4 - F 5
4.	Witness Statement of Nicki Wellings (Wolverhampton) 11 06 22	F 6
5.	Witness Statement of Ronald Hill (Sandwell) 31 05 22	F 7
6.	Witness Statemet of Sheila Powell (Sandwell) 10 06 22	F 8 - F 9

G. SECTION G - Statements of Councillors, MPs, Residents and Business for Walsall

1.	Witness Statement of Simon Pearson (Walsall) 28 04 22	G 1 - G 2
2.	Witness Statement of Kelly Matthews (Walsall) 28 04 22	G 3 - G 4
3.	Witness Statement of Julia Westwood (Walsall) 13 05 2022	G 5 - G 6
4.	Witness Statement of Lee Roden (Walsall) 21 05 2022	G 7 - G 8
5.	Witness Statement of Robert Norton (Walsall) 22 05 2022	G 9 - G 10
6.	Witness Statement of Ravdeep Khara (Walsall) 24 05 2022	G 11 - G 12

SUPPLEMENTARY BUNDLE

1.	Lisa Fox Statement	28-10-2020	p 1 - p 2
2.	Rajbinder Kaur Statement	03-11-2020	p 3 - p 4
3.	Rachel Fanthom Statement	13-04-2021	p 5 - p 7
4.	Jeffrey Differ Statement	27-10-2020	p 8 - p 9
5.	Richard Hardy Statement	16-10-2020	p 10 - p 11
6.	David England Statement	03-11-2020	p 12 - p 13
7.	Hema Hayer Statement	27-10-2020	p 14 - p 16
8.	Faye Willetts Statement	12-04-2021	p 17 - p 21