

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)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) 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 SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

Defendants

12th AND 13th WITNESS STATEMENTS OF MR PAUL BROWN

Statements and Exhibits

1.	12th Statement of Paul Brown 16 6 23	p 1 - p 8
2.	Exhibit Cover PB12A	p 9
3.	EXHIBIT PB12A	p 10 - p 37
4.	Exhibit Cover PB12B	p 38
5.	EXHIBIT PB12B	p 39 - p 40
6.	13th Statement of Paul Brown 16 6 23	p 41 - p 43
7.	Exhibit Cover PB13A	p 44
8.	EXHIBIT PB13A	p 45

Statements and Exhibits

i) Statement of: Paul Brown
ii) Statement No: 12
iii) For: Claimants
iv) Dated: 16.6.2023
v) Exhibits: PB12A – PB12B

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

CLAIM NO: KB-2022-BHM000188

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- (1) WOLVERHAMPTON CITY COUNCIL**
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Defendants

TWELFTH 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 Mr Justice Ritchie on 19 May 2023 required the Claimants to take a series of publicity steps publicising the outcome of the hearing to bring notice of the hearing to the attention of "Persons Unknown".

7. The information below details these steps and how, I respectfully suggest, the Claimant Councils have fulfilled these steps.
8. Issuing a media release highlighting the continuation of the Injunction and Power of Arrest

Such release must provide:

- (a) Details of the application and summarise the orders made;
- (b) Any deadline for filing any documents by the Defendants;
- (c) The date, time and location of any future hearings, if known
- (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (e) The Claimants' contact details; and
- (f) Details of where and how copies of the Injunction, Power of Arrest, this Order, 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 26 May 2023.

I can confirm that the media release was issued to the above outlets on 23 May 2023. Please see "City of Wolverhampton Council media release – interim injunction granted" within **“Exhibit PB12A” attached hereto** which refers and also includes screengrabs of the news items on Claimants' websites ("News release on City of Wolverhampton Council website – interim injunction granted", "News release on Sandwell

Council website – interim injunction granted", "News release on Walsall Council website – interim injunction granted" & "News release on Dudley Council website – interim injunction granted"), and coverage in the Birmingham Mail/Birmingham Live ("Birmingham Live, 24 May 2023") and Express & Star ("Express & Star, 25 May 2023"). The news was also featured on BBC WM, Dudley News, Free Radio and in the Local Government Lawyer.

9. 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 26 May 2023.

I can confirm that the Claimants shared social media relating to the above media release on 23 May 2023. Please see "City of Wolverhampton Council social media – interim injunction granted", "Sandwell Council social media – interim injunction granted", "Walsall Council social media – interim injunction granted" & "Dudley Council social media – interim injunction granted" within **"Exhibit PB12A" attached hereto** which refers and contains screengrabs of examples of the social media.

The court may wish to know that a subsequent media release, focused on the punishments that people could face if they were to breach the interim injunction, "Street racers could face jail for breaching court injunction", was issued on Tuesday 6 June, 2023, and was shared in the same way as the above. A copy of the media release of 6 June 2023 appears attached hereto marked **"Exhibit PB12B"** for the sake of completeness.

10. 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/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 the Injunction Order, the Power of Arrest, the Order of Freeman J, this Order, the Documents and the Evidence and be updated by 23:59 on 26 May 2023.

I can confirm the webpages have been updated as required. Please see "City of Wolverhampton Council street racing injunction page", "Sandwell Council street racing injunction page", "Walsall Council street racing injunction page" & "Dudley Council street racing injunction page" within **"Exhibit PB12A" attached hereto** which refers and contains screengrabs of the webpages.

11. 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 23:59 on 26 May 2023.

I can confirm that Claimants' main websites have and retain a prominent direct link to the dedicated street racing injunction webpages. Please see "City of Wolverhampton Council homepage", "Dudley Council homepage", "Walsall Council homepage" & "Sandwell Council homepage" within **"Exhibit PB12A" attached hereto** which refers and contains screengrabs of examples of the webpages.

12. Ensuring that copies of the Injunction, the Power of Arrest and this Order are available at the front desks of the Claimants' main offices by 23:59 on 26 May 2023.

I can confirm that copies of the Injunction, the Power of Arrest and this Order have been made available at the front desks of the Claimants' main offices as required.

13. Ensuring that the video previously uploaded to the video sharing website "YouTube" and the Claimants' websites and social media pages (including Instagram, Twitter and Facebook), now states that this Order has been made and the Injunction and Power of Arrest continue in force.

This may be done by uploading a fresh video (which must contain all the matters previously ordered by Hill J) or prominently adding text to the existing video (or the description of the existing video on any website or social media page) stating "Following a hearing on 19 May 2023 The Injunction and Power of Arrest continue in force: The video and/or addition of text shall be uploaded or the text added by 23:59 on 26 May 2023.

I can confirm that a new video was produced and uploaded to the City of Wolverhampton Council's YouTube channel at <https://youtu.be/hVPjkdhlwY> on 24 May 2023. It has also been shared via the Claimants' social media channels and added to the respective street racing injunction webpages. Please see "City of Wolverhampton Council YouTube - video", "City of Wolverhampton Council social media – video", "Dudley Council social media – video", "Sandwell Council social media – video" & "Walsall Council social media – video" within **"Exhibit PB12A" attached hereto** which refers and contains screengrabs of the video and social media.

14. Requesting that West Midlands Police post on their website and Instagram, Twitter, and Facebook accounts, a link to the media release. Such request to be made by 23:59 on 26 May 2023.

I can confirm that a request was made on 23 May 2023 and complied with. Please see "West Midlands Police social media – interim injunction granted", "Wolverhampton Police social media – interim injunction granted", "Sandwell Police social media – interim injunction granted",

"Walsall Police social media – interim injunction granted" & "Dudley Police social media – interim injunction granted" within **“Exhibit PB12A” attached hereto** which refers and contains screengrabs of examples of the social media. Please also see "Confirmation of West Midlands Police activity – interim injunction granted" **within “Exhibit PB12A” attached hereto.**

15. Continuing to cause 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

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”;

I can confirm that the signage continues to be displayed, both at fixed locations and at regular intervals on digital signage, as described above, throughout the Black Country Area.

16. For the above reasons stated reasons, I believe that notice of the outcome of the hearing for the application of the Injunction and Power of Arrest 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.
17. 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.

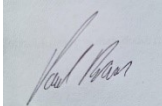
STATEMENT OF TRUTH

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 

Print Name PAUL BROWN

Dated: 16 June 2023

i) Statement of: Paul Brown
ii) Statement No: 12
iii) For: Claimants
iv) Dated: 16.6.2023
v) Exhibits: PB12A – PB12B

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Defendants

EXHIBIT PB12A

This is the document referred to as "Exhibit PB12A" in the witness statement of Paul Brown dated 16 June 2023.

Media Release



High Court continues interim Black Country street racing ban

Released: Tuesday 23 May, 2023



The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday (19 May, 2023).

The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December, continued by the Honourable Mr Justice Freedman in February and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday, with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Adults and Wellbeing, said: "We are pleased that the High Court has seen fit to continue the street racing injunction, which is certainly having an effect on preventing meets from occurring in our region.

EXHIBIT PB12A

"Street racing is noisy, dangerous and illegal and, as we have tragically seen in the last 12 months, can result in death or serious injuries among drivers, passengers and spectators. This interim injunction provides a very strong deterrent to anyone thinking of taking part in this anti-social activity."

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants: www.wolverhampton.gov.uk/street-racing-injunction, https://go.walsall.gov.uk/black_country_car_cruising_injunction, www.sandwell.gov.uk/streetracing, or www.dudley.gov.uk/car-cruising-injunction.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

- **Issued by the City of Wolverhampton Council's Corporate Communications Team.**
- **For more information, please call 01902 555439.**
- **More news from the City of Wolverhampton Council is available at:**
 - www.wolverhampton.gov.uk/news
 - www.twitter.com/wolvescouncil
 - www.facebook.com/wolverhamptontoday
 - www.youtube.com/wolverhamptontoday

City of Wolverhampton Council media release – interim injunction granted

High Court continues interim Black Country street racing ban

HOME / NEWS / HIGH COURT CONTINUES INTERIM
BLACK COUNTRY STREET RACING BAN

The High Court has continued the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country.

The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of 2 or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

The interim injunction covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

The interim injunction, which is served against 'persons unknown', was initially granted by The Honourable Mrs Justice Hill in December, and reviewed by The Honourable Mr Justice Freedman at the High Court in Birmingham yesterday (Monday 13 February, 2023).

Highlighting the need for such an injunction, The Honourable Mr Justice Freedman referenced an incident in Oldbury last autumn which caused 2 deaths and which was "linked unequivocally to car cruising", along with other incidents causing harm in Stevenage, Warrington and Scunthorpe involving fatalities and life changing injuries.

He permitted the original order to continue, with a further hearing to take place in May to consider whether the interim injunction should remain in force or be amended. This will be held on Monday 15 May 2023 at 10.30am at the Birmingham District Registry, Civil Justice Centre, The Priory Courts, 33 Bull Street, Birmingham, B4 6DS.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death, as we tragically saw last autumn in Oldbury.

"We are pleased that the High Court has recognised the positive impact that the interim street racing injunction has had since its introduction in December, and has permitted it to remain in force."

For more information, including details of full terms of the interim injunction and evidence in support of the application, please visit the street racing injunction pages of the applicants:

[City of Wolverhampton Council](#)

[Walsall Council](#)

[Sandwell Council](#)

[Dudley Council](#)

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.



The High Court has continued the interim injunction banning 'street racing', also known as 'car cruising', in the Black Country

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LAST UPDATED

16 February 2023

News release on City of Wolverhampton Council website – interim injunction granted

High Court continues interim Black Country street racing ban

Published 24th May 2023



The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday (19 May, 2023).

The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It covers the whole of the boroughs of Sandwell, Dudley, Walsall and Wolverhampton and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December 2022, continued by the Honourable Mr Justice Freedman in February 2023 and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday (19 May 2023), with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

A spokesperson for the application said: "We are pleased that the High Court has seen fit to continue the street racing injunction, which is certainly having an effect on preventing meets from

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News release on Sandwell Council website – interim injunction granted

High Court continues interim Black Country street racing ban

Published on 24 May 2023

[Print](#)

The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday 19 May 2023.



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The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December, continued by the Honourable Mr Justice Freedman in February and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday, with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

“ We are pleased that the High Court has seen fit to continue the street racing injunction, which is certainly having an effect on preventing meets from occurring in our region.

The High Court continues interim Black Country street racing ban

Posted on: 23/05/2023

#street racing

#car cruising

#injunction

#road safety

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The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday (19 May, 2023).

The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

The interim injunction and power of arrest were initially granted by the Honourable Mrs Justice Hill in December, continued by the Honourable Mr Justice Freedman in February and reviewed and continued by The Honourable Mr Justice Ritchie at the High Court in Birmingham on Friday, with minor amendments to both the injunction and power of arrest.

The injunction remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case. In the meantime, there will be a further case management hearing later this year.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants: www.wolverhampton.gov.uk/street-racing-injunction, https://go.walsall.gov.uk/black_country_car_cruising_injunction, www.sandwell.gov.uk/streetracing, or www.dudley.gov.uk/car-cruising-injunction.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

News release on Dudley Council website – interim injunction granted

Time to rid our roads of dangerous street racers for good, says MP, after latest action

Nicola Richards MP has welcomed the temporary measure but says more is needed to tackle street racing

BLACK COUNTRY By [Jamie Brassington](#)

14:33, 24 MAY 2023

Bookmark



Comments



Police crackdown on boy racers in Operation Hercules

A Black Country MP has welcomed an interim car cruising ban to tackle "dangerous" street racing on the region's streets. The interim measure was approved by the High Court last Friday, May 19, banning people from racing or carrying out stunts in [Dudley](#), Sandwell, [Walsall](#) and Wolverhampton.

The interim measure was first made in December, and then extended in February, before it was re-extended last week. It comes after Ben Corfield, 19 and Liberty Charris, 16, were [killed at an alleged car meet](#) in Oldbury in November. And it also follows a BirminghamLive investigation which revealed how highly reckless and dangerous driving by street racers are being [openly advertised on social media](#).

Welcoming the interim measure, Ms Richards who represents West Bromwich East said: "I'm pleased to see that the injunction against car cruising in the Black Country has been extended. Racing on our streets is dangerous and it has tragically cost people their lives.

"The injunction gives police the power to arrest people taking part anywhere in the Black Country, a power they would not otherwise have. Whilst it is an important short-term measure, it has to be part of a wide-ranging operation to drive this dangerous activity off our streets.

"I'll be working with the police and pushing local councils to do even more to tackle this dangerous behaviour on our roads." Wolverhampton Council said the injunction "prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving".

The interim injunction will be in place until the next hearing is made, but there has been no date set at the moment. Wolverhampton said the injunction "remains interim at this stage, pending a judgment from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case".

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EXHIBIT PB12A

Councillor Jasbir Jaspal, Wolverhampton Council's cabinet member for adults and wellbeing, added: "We are pleased that the High Court has seen fit to continue the street racing injunction, which is certainly having an effect on preventing meets from occurring in our region. Street racing is noisy, dangerous and illegal and, as we have tragically seen in the last 12 months, can result in death or serious injuries among drivers, passengers and spectators.

"This interim injunction provides a very strong deterrent to anyone thinking of taking part in this antisocial activity."

Birmingham Live, 24 May 2023: <https://www.birminghammail.co.uk/black-country/time-rid-roads-dangerous-street-26979920>

Tougher measures needed to tackle 'dangerous' car cruising, says West Bromwich MP

By [Peter Madeley](#) | [West Bromwich](#) | [Politics](#) | Published: 10 hours ago |  2 Comments

An MP has called for tougher measures to tackle car cruising on the roads of the Black Country.

Nicola Richards welcomed the extension of an interim street racing injunction, which was approved by the High Court and covers Dudley, Sandwell, Walsall and Wolverhampton.

It means anyone participating as a driver, a rider or a passenger, in a gathering of two or more people where some of those present engage in motor racing or motor stunts can face penalties including prison or a fine.

But the West Bromwich East MP said the injunction should only be seen as a "short-term measure".

She said: "I'm pleased to see that the injunction against car cruising in the Black Country has been extended.

"Racing on our streets is dangerous and it has tragically cost people their lives. The injunction gives police the power to arrest people taking part anywhere in the Black Country, a power they would not otherwise have.

"Whilst it is an important short-term measure, it has to be part of a wide-ranging operation to drive this dangerous activity off our streets.

"I'll be working with the police and pushing local councils to do even more to tackle this dangerous behaviour on our roads."

The interim injunction has now been extended twice since it was first brought in last December.

Wolverhampton Council, which led the application on behalf of the other local authorities, said the injunction remains interim pending a judgement from the Supreme Court which is currently considering a similar injunction served against persons unknown, which may have a bearing on the Black Country case.

It comes after Ben Corfield, aged 19 and Liberty Charris, 16, both from Dudley, were [killed at an alleged car meet in Oldbury in November](#).

Express & Star, 25 May 2023:

<https://www.expressandstar.com/news/politics/2023/05/25/tougher-measures-needed-to-tackle-car-cruising-says-mp/>

EXHIBIT PB12A

Wolverhampton Today
Published by Orlo · 17 h · 🌐


The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday.

The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving. It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants: Wolverhampton - <https://www.wolverhampton.gov.uk/street-racing-injunction>, Walsall - https://go.walsall.gov.uk/black_country_car_cruising..., Sandwell - <https://www.sandwell.gov.uk/streetracing>, or Dudley - <https://www.dudley.gov.uk/car-cruising-injunction> <https://www.wolverhampton.gov.uk/street-racing-injunction>, https://go.walsall.gov.uk/black_country_car_cruising..., <https://www.sandwell.gov.uk/streetracing>, or www.dudley.gov.uk/car-cruising-injunction.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

Full story 📰 <https://www.wolverhampton.gov.uk/.../high-court-continues...>




Wolves Council
@WolvesCouncil

The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations. Full story 📰 [wolverhampton.gov.uk/news/high-court-continues...](https://www.wolverhampton.gov.uk/news/high-court-continues...) @WalsallCouncil @dudleymbc @SandwellCouncil @WMPolice (1/4)



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The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving. (2/4)

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Wolves Council @WolvesCouncil · 17h

It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized. (3/4)

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Wolves Council @WolvesCouncil · 17h

For more information, please visit the interim street racing injunction pages of the applicants: Wolverhampton - [wolverhampton.gov.uk/street-racing-injunction](https://www.wolverhampton.gov.uk/street-racing-injunction), Walsall - go.walsall.gov.uk/black_country_car_cruising..., Sandwell - [sandwell.gov.uk/streetracing](https://www.sandwell.gov.uk/streetracing), or Dudley - [dudley.gov.uk/car-cruising-injunction](https://www.dudley.gov.uk/car-cruising-injunction). (4/4)

wolverhampton_today

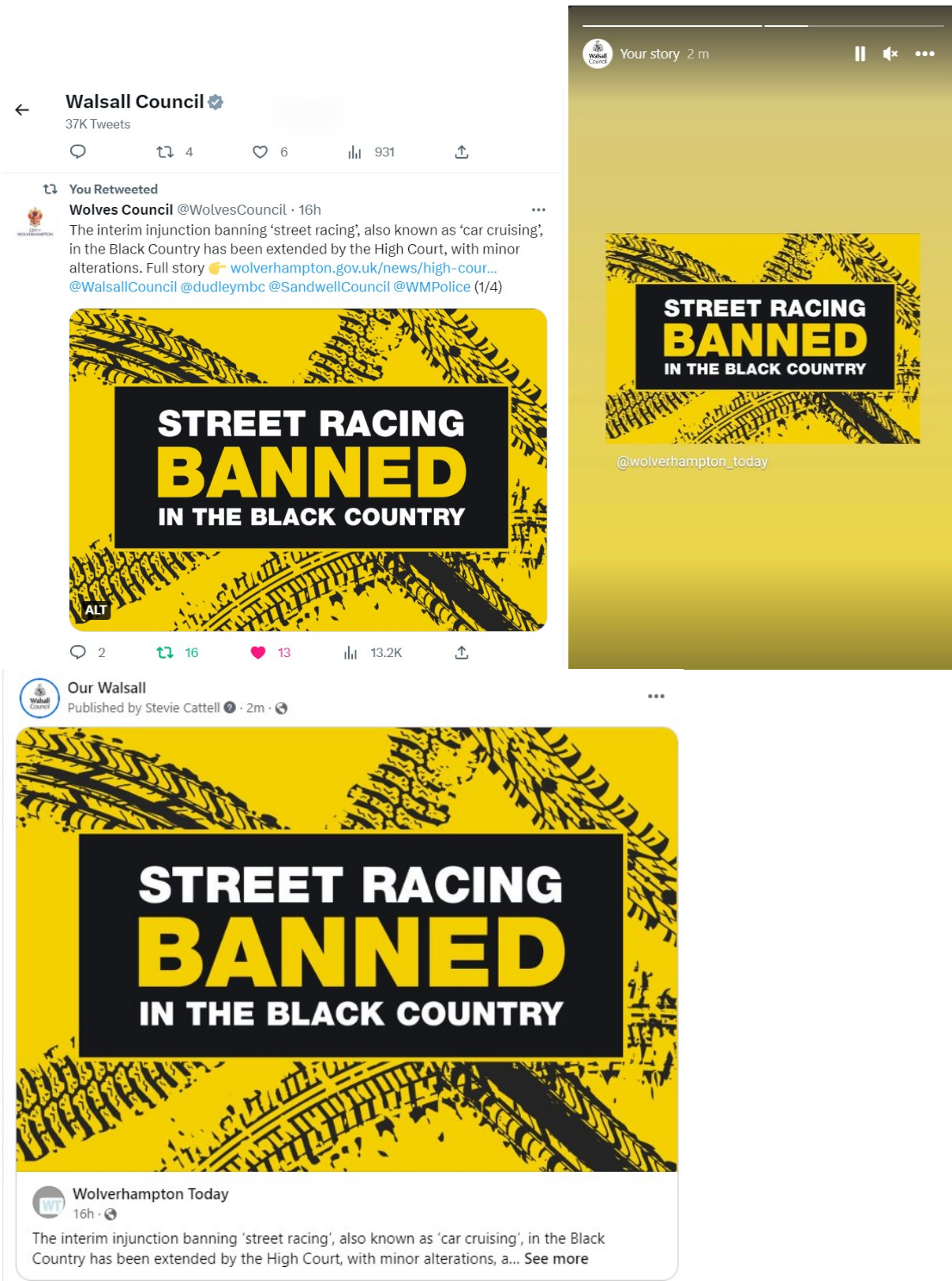
wolverhampton_today The interim injunction banning 'street racing', also known as 'car cruising', in the Black Country has been extended by the High Court, with minor alterations, at a hearing on Friday.

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For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants: the City of Wolverhampton Council, Dudley Council, Sandwell Council and Walsall Council. Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

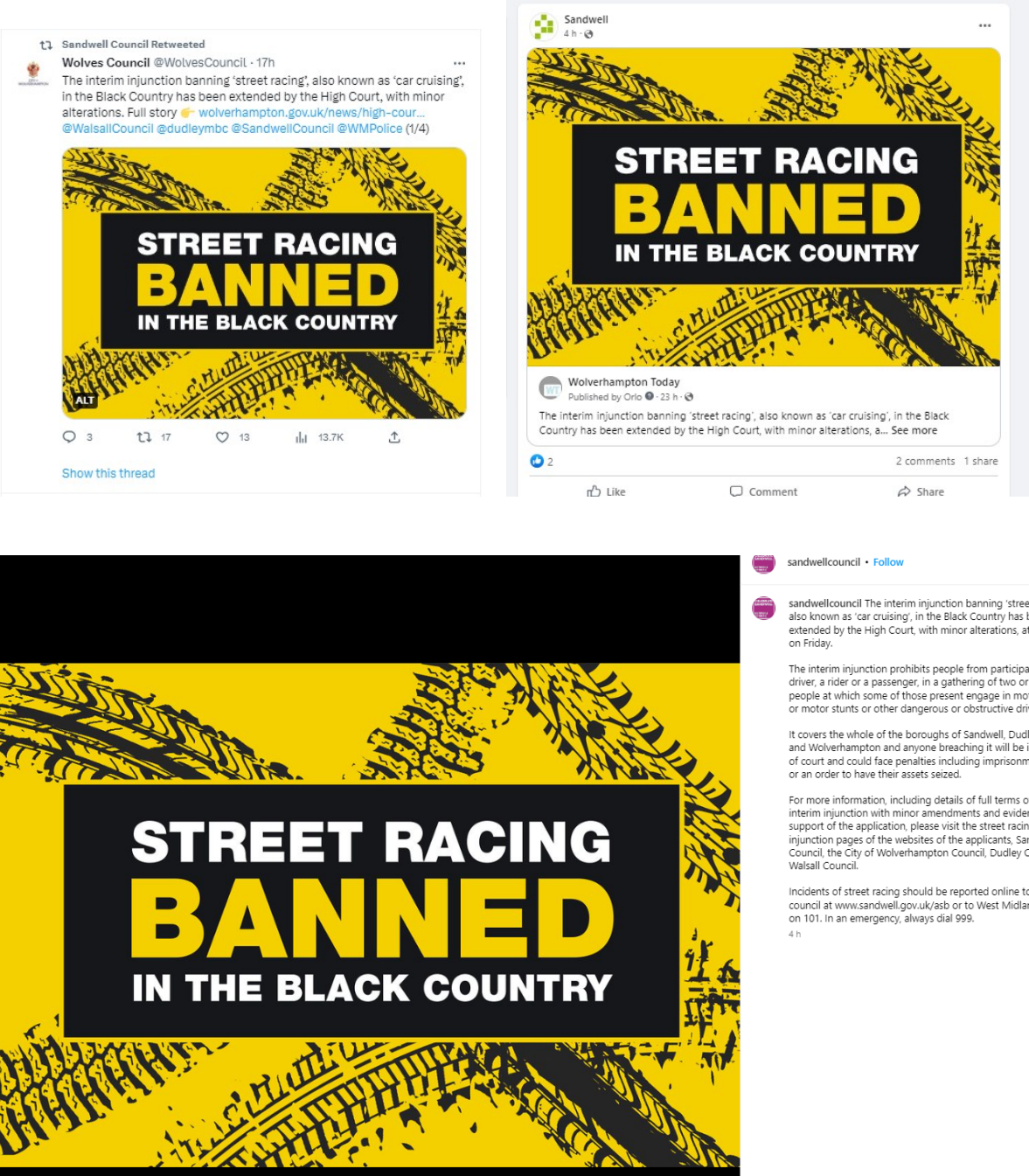
17h

City of Wolverhampton Council social media – interim injunction granted



Walsall Council social media – interim injunction granted

EXHIBIT PB12A



Sandwell Council social media – interim injunction granted

EXHIBIT PB12A



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The interim injunction prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving. It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

For more information, including details of full terms



Dudley Council social media – interim injunction granted

EXHIBIT PB12A

High Court grants order banning street racing in the Black Country

HOME / PARKING AND ROADS / HIGH COURT GRANTS ORDER BANNING STREET RACING IN THE BLACK COUNTRY

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

"Burnouts" – causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed

"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

"Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input

"Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

The Injunction has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it.

Breach of an injunction is a contempt to court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

The Black Country Area includes all of the Boroughs of Wolverhampton, Dudley, Sandwell and Walsall.

Full details of the interim injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found in the downloads section of this page.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

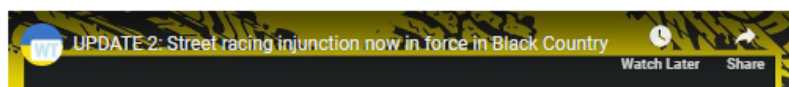


YOU MAY ALSO LIKE

High Court continues interim Black Country street racing ban

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-  [Combined Directions Order 19 May 2023 \(Sealed 23 May 2023\) \(23/05/2023\)](#)
-  [Clearer Copy of Plan A for injunction \(WCC & Ors v Persons Unknown KB-2022-BHM-000188\) \(23/05/2023\)](#)
-  [11th Witness Statement of Paul Brown \(17/05/2023\)](#)
-  [Exhibit PB11A \(17/05/2023\)](#)
-  [Hearing Note \(15/02/2023\)](#)
-  [Bundle for Review Hearing \(15/05/2023\)](#)
-  [1800273 - Hearing Notice - Hearing 15 May 2023 at 10.30am \(15/05/2023\)](#)
-  [Trial Notices and DJs-Interim Hearing Date Notice \(12/05/2023\)](#)
-  [Exhibit PB10A \(09/05/2023\)](#)
-  [10th Witness Statement of Paul Brown \(09/05/2023\)](#)



City of Wolverhampton Council street racing injunction page

Street racing



High Court grants order banning street racing in the Black Country

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

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- "Drifting" – turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- "Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

The Injunction has a Power of Arrest attached to it which gives the police the power to arrest anyone who breaches it.

Breach of an injunction is a contempt to court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

The Black Country Area includes all of the Boroughs of Sandwell, Dudley, Walsall and Wolverhampton.

Full details of the interim injunction, including evidence presented to the High Court, the Sealed Order, Power of Arrest and other supporting documentation such as a map showing the Black Country area, can be found on [our street racing downloads webpage](#).

Incidents of street racing should be [reported online to the council](#) or to West Midlands Police on 101. In an emergency, always dial 999.

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EXHIBIT PB12A

High Court grants order banning street racing in the Black Country

An interim injunction banning 'street racing', also known as 'car cruising', is in force in the Black Country.

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For the purposes of the injunction, stunts are defined as driving manoeuvres often undertaken at such gatherings including but not limited to:

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Breach of an injunction is a contempt of court and if proved the court has the power to impose a sentence of imprisonment, a fine, or an order seizing a person's assets.

The Black Country Area includes all of the Boroughs of Wolverhampton, Dudley, Sandwell and Walsall.

Full details of the interim injunction, including evidence presented to the High Court, the Sealed Order, power of arrest and other supporting documentation such as a map showing the Black Country area, can be found in the downloads section of this page.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

[Audio information about the interim street racing injunction application.](#)

Downloads

- [Amended Power of Arrest \(Amended 19 May 2023; Sealed 23 May 2023\) \(23 May 2023\)](#)
- [Amended Injunction Order 19 May 2023 \(Sealed 23 May 2023\) \(23/05/2023\)](#)
- [Combined Directions Order 19 May 2023 \(Sealed 23 May 2023\) \(23/05/2023\)](#)
- [Clearer Copy of Plan A for injunction \(WCC & Ors v Persons Unknown KB-2022-BHM-000188\) \(23/05/2023\)](#)
- [11th Witness Statement of Paul Brown \(17/05/2023\)](#)
- [Exhibit PB11A \(17/05/2023\)](#)
- [Hearing Note \(15/02/2023\)](#)
- 1800273 Hearing Notice - Hearing 15 May 2023 at 10:30 am

Dudley Council street racing injunction page

Black Country street racing injunction

Overview

An interim injunction banning street racing (also known as car cruising) is in force in the Black Country.

The Black Country area includes all of the boroughs of Dudley, Sandwell, Walsall and Wolverhampton.

You can download full details of the interim injunction in the [supporting documents](#) section.

What the interim injunction means

It forbids anyone who is a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

At these gatherings, some people engage in motor racing or motor stunts or other dangerous or obstructive driving. For the purposes of the injunction, stunts are defined as driving manoeuvres including, but not limited to:

- burnouts - causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed
- 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
- drifting - turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input
- undertaking - passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

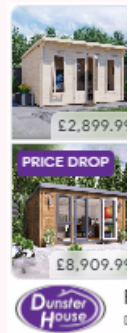
Details of the injunction

The injunction has a power of arrest attached to it. This gives the police the power

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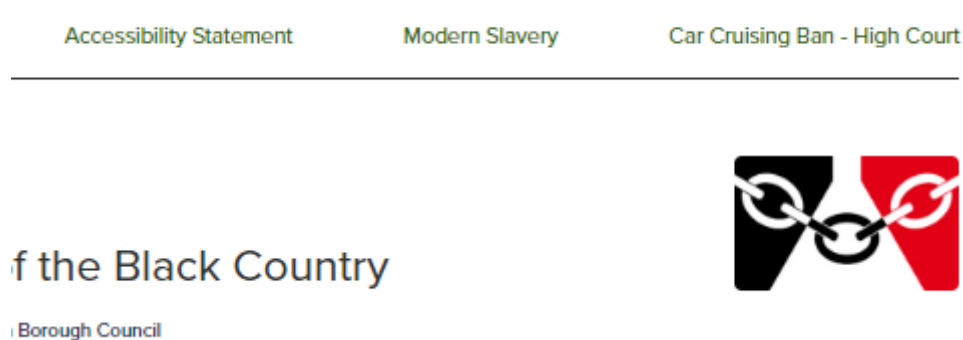


Walsall Council street racing injunction page

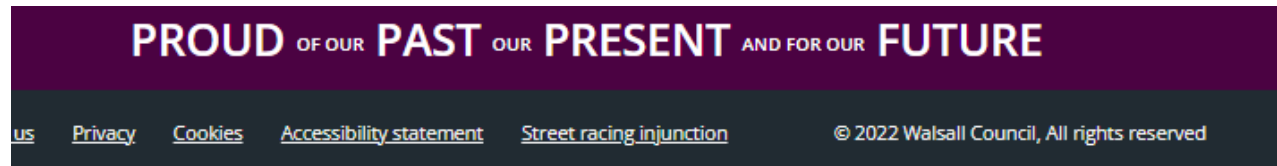
EXHIBIT PB12A

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Dudley Council homepage



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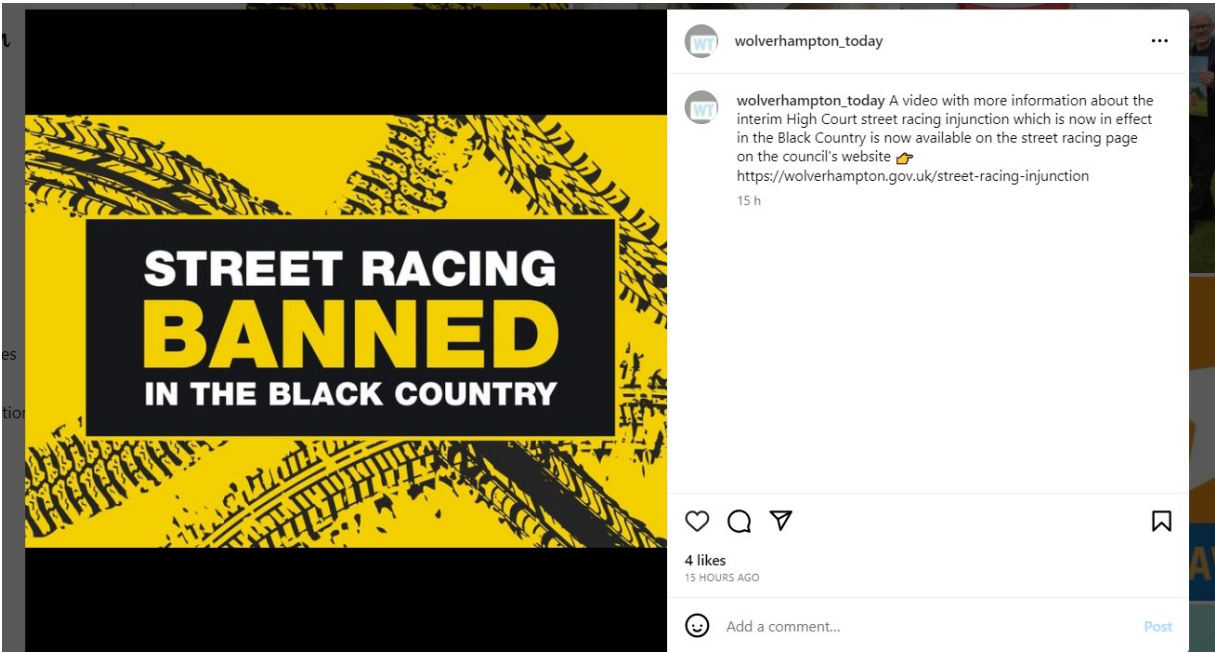
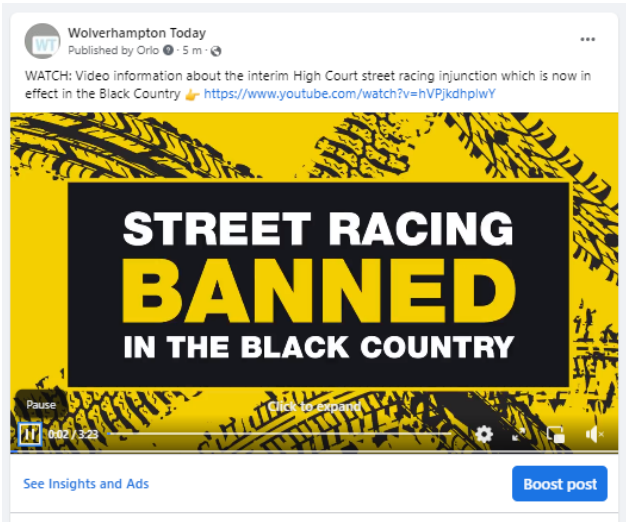
Video information about the interim High Court street racing injunction which is now in effect in the Black Country. For more details, please visit www.wolverhampton.gov.uk/street-racing-injunction

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City of Wolverhampton Council YouTube - video

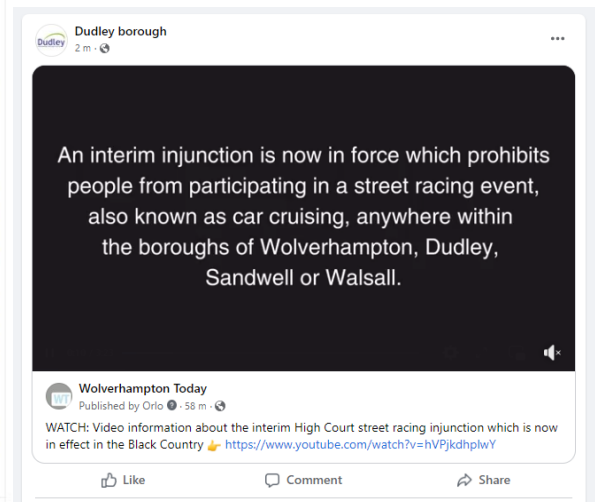
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EXHIBIT PB12A

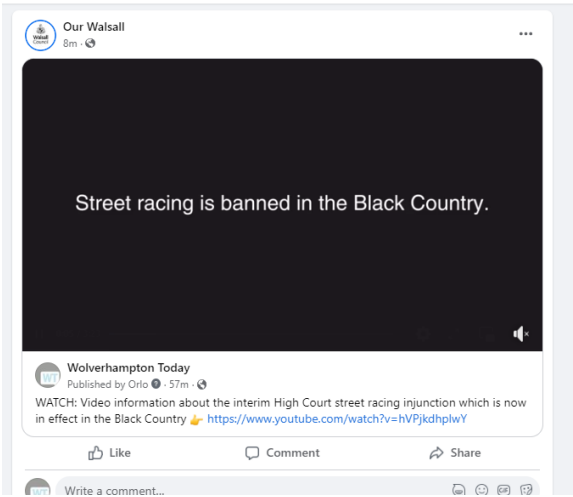


City of Wolverhampton Council social media – video

EXHIBIT PB12A

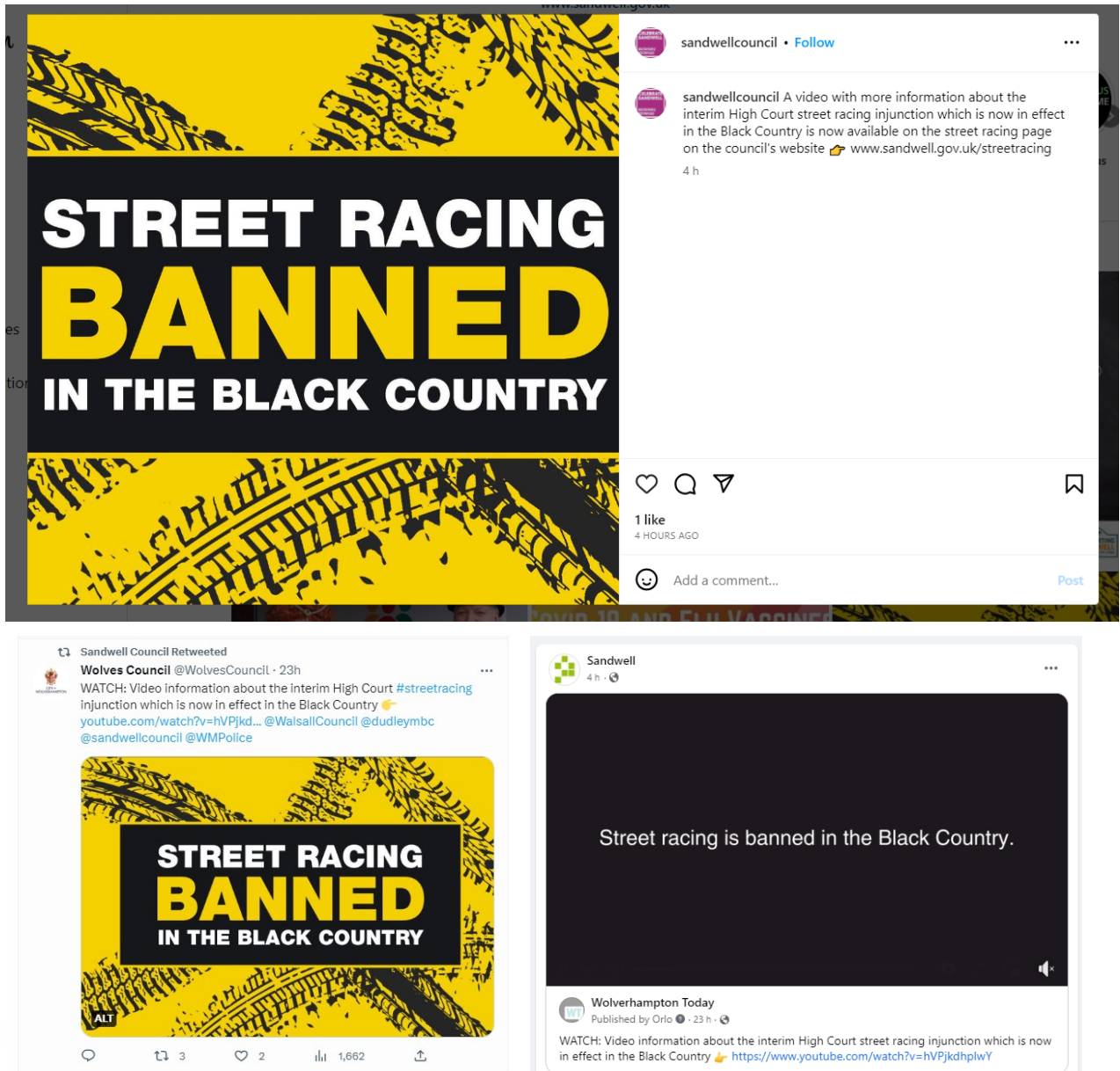


Dudley Council social media – video



Walsall Council social media – video

EXHIBIT PB12A



Sandwell Council social media - video

EXHIBIT PB12A



West Midlands Police social media – interim injunction granted

EXHIBIT PB12A



Wolverhampton Police social media – interim injunction granted

EXHIBIT PB12A



Dudley Police social media – interim injunction granted

EXHIBIT PB12A



Sandwell Police social media – interim injunction granted

EXHIBIT PB12A



Walsall Police social media – interim injunction granted

EXHIBIT PB12A

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Hi Paul,

That's now shared across all WMP Force level Facebook, Twitter and Instagram accounts, and also from the four Black Country local policing area accounts. Also shared on Instagram.

[@Darren Colley](#) – Could you add a link to the council's story to our website as described below?

Thanks,

Mike

Mike Woods | News Manager
Corporate Communications | West Midlands Police
T: Newsdesk: 0121 626 5858 or 101 (ext. 801 2055) | M: 07741 816 450

Confirmation of West Midlands Police activity – interim injunction granted

i) Statement of: Paul Brown
ii) Statement No: 12
iii) For: Claimants
iv) Dated: 16.6.2023
v) Exhibits: PB12A – PB12B

**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)**

**4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON
MOTOR VEHICLE(S) 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 SUCH DEFENDANTS ENGAGE
IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR
OBSTRUCTIVE DRIVING**

Defendants

EXHIBIT PB12B

This is the document referred to as "Exhibit PB12B" in the witness statement of Paul Brown dated 16 June 2023.

Media Release

**CITY OF
WOLVERHAMPTON
COUNCIL**

Street racers could face jail for breaching court injunction

Released: Tuesday 6 June, 2023



Would-be 'street racers' and 'car cruisers' are being warned they could face a prison sentence if they breach the interim High Court injunction in force across the Black Country.

The interim injunction banning 'street racing', also known as 'car cruising', prohibits people from participating, as a driver, a rider or a passenger, in a gathering of two or more people at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

It came into effect in December 2022 and was ordered to continue by the High Court at a hearing on 19 May 2023. It covers the whole of the boroughs of Wolverhampton, Dudley, Sandwell and Walsall and anyone breaching it will be in contempt of court and could face penalties including imprisonment, a fine or an order to have their assets seized.

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council and Walsall Council, and supported by West Midlands Police.

Councillor Jasbir Jaspal, the council's Cabinet Member for Adults and Wellbeing, said: "People who are thinking of taking part in street racing or car cruising should be under no illusions as to the penalties they may face.

"Breaching the interim injunction in place across the Black Country would be contempt of court, which is a very serious offence.

"As such, individuals could face up to two years' in jail, an unlimited fine or have assets, such as their vehicle, seized.

“In addition, a power of arrest applies to the interim injunction. This gives police the power to arrest suspects and bring them before the court, in as little as 24 hours, to answer allegations that they have breached the injunction, so any potential breaches can be dealt with very swiftly indeed.

“These are stiff punishments which we hope will prove a deterrent to would-be street racers or car cruisers and therefore help keep our region’s streets free of this anti-social and dangerous behaviour.”

For more information, including details of full terms of the interim injunction with minor amendments and evidence in support of the application, please visit the street racing injunction pages of the applicants:

www.wolverhampton.gov.uk/street-racing-injunction,
https://go.walsall.gov.uk/black_country_car_cruising_injunction,
www.sandwell.gov.uk/streetracing, or www.dudley.gov.uk/car-cruising-injunction.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

- **Issued by the City of Wolverhampton Council’s Corporate Communications Team.**
- **For more information, please call 01902 555439.**
- **More news from the City of Wolverhampton Council is available at:**
 - www.wolverhampton.gov.uk/news
 - www.twitter.com/wolvescouncil
 - www.facebook.com/wolverhamptontoday
 - www.youtube.com/wolverhamptontoday

i) Statement of: Paul Brown
ii) Statement No: 13
iii) For: Claimants
iv) Dated: 16.6.2023
v) Exhibits: PB13A

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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)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) 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 SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

Defendants

THIRTEENTH 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. I make this statement to update the High Court on the publication of the amended Part 8 Claim Form and the Amended Particulars of Claim Form on the websites of the four claimant councils.

7. I can confirm that the above documents were published on the four websites by 5pm on 15 June, 2023. Please see **Exhibit PB13A attached hereto** which refers and also includes screengrabs of the news items on Claimants' websites,

<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

8. Copies of the above documents have also been made available within the bundles held at the front desks of the Claimants' main offices as required.
9. 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

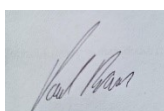
I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: Wolverhampton City Council

Signed



Print Name PAUL BROWN

Dated: 16 June 2023

i) Statement of: Paul Brown
ii) Statement No: 13
iii) For: Claimants
iv) Dated: 16.6.2023
v) Exhibits: PB13A

**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
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Claimants

and

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AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE
IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR
OBSTRUCTIVE DRIVING**





Defendants

EXHIBIT PB13A






This is the document referred to as "Exhibit 13A" in the witness statement of Paul Brown dated 16 June 2023.

EXHIBIT PB13A

DOWNLOADS

-  [Amended Particulars of Claim June 2023 \(15/06/2023\)](#)
-  [Part 8 Claim form amended June 2023 pages 1-2 of 3 \(15/06/2023\)](#)
-  [Part 8 Claim form amended June 2023 page 3 of 3 \(15/06/2023\)](#)
-  [Amended Power of Arrest \(Amended 19](#)

City of Wolverhampton Council street racing page

- [EXHIBIT PB13A](#)  (PDF)
- [Part 8 Claim Form - amended June 2023](#)  (PDF)
- [Part 8 Claim Form - amended June 2023 - file 2](#)  (PDF)
- [Part 8 Particulars of Claim - amended June 2023](#)  (PDF)
- [Hearing Note for 15 May 2023](#)  (PDF)

Sandwell Council street racing page

DOWNLOADS

- [Amended Particulars of Claim June 2023 \(15/06/2023\)](#)
- [Part 8 Claim form amended June 2023 pages 1-2 of 3 \(15/06/2023\)](#)
- [Part 8 Claim form amended June 2023 page 3 of 3 \(15/06/2023\)](#)
- [Amended Power of Arrest \(Amended 19 May 2023; Sealed 23 May 2023\) \(](#)

Dudley Council street racing page

- [http://www.dudley.gov.uk/Assets/Attachments/151/0131181/](#)
27. [Amended particulars of claim June 2023 \(15 June 2023\) PDF 152KB\)](#)
 28. [Part 8 claim form \(amended June 2023\) 1-2 of 3 \(15 June 2023\) PDF 728KB\)](#)
 29. [Part 8 claim form \(amended June 2023\) 3 of 3 \(15 June 2023\) \(.279KB\)](#)

Walsall Council street racing page