

N244

# Application notice

For help in completing this form please read the notes for guidance form N244Notes.

<b>Name of court</b> High Court of Justice, King's Bench Division, Birmingham District Registry	<b>Claim no.</b> KB-2022-BHM-000188
<b>Fee account no.</b> (if applicable) PBA0082797	<b>Help with Fees - Ref no.</b> (if applicable) HWF - [ ][ ] - [ ][ ][ ][ ]
<b>Warrant no.</b> (if applicable)	
<b>Claimant's name</b> (including ref.) Wolverhampton City Council & Others (ref: LIT/AS/LIJ017753P)_	
<b>Defendant's name</b> (including ref.) Persons Unknown & Named Defendants	
<b>Date</b>	14 April 2026

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<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personalinformation-charter>

1. What is your name or, if you are a legal representative, the name of your firm?

Wolverhampton City Council

2. Are you a  Claimant  Defendant  Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

The Claimant Councils (Wolverhampton, Sandwell and Walsall)

3. What order are you asking the court to make and why?

So far as may be necessary, an order for relief from sanctions flowing from a failure to comply with the directions order of 27 February 2026.

4. Have you attached a draft of the order you are applying for?  Yes  No

5. How do you want to have this application dealt with?  at a hearing  without a hearing

at a telephone hearing

6. How long do you think the hearing will last? [ ] Hours [ ] Minutes

Is this time estimate agreed by all parties?  Yes  No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

High Court Judge or Section 9 Judge

9. Who should be served with this application?

The Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

Following a hearing on 27 February 2026 at which an Injunction granted on 27 February 2024 by Julian Knowles J to restrain Car Cruising and Street Racing in the combined local government area for which the Claimant Councils are responsible (“the Injunction”), the Injunction was ordered to continue subject to slight revisions, Directions were made (“the Case Management Order”) detailing the requisite steps the Claimants were required to take to effect service of the revised injunction, power of arrest and directions order on Persons Unknown, Her Honour Judge Emma Kelly considered the draft orders before her. These orders were subsequently approved, sealed on 3 March 2026 and distributed to the Claimants that same day.

Upon considering the Orders, the Claimants noted that the Case Management Order of 3 March 2025 at paragraph 9 provides that:

*“The Claimants must verify completion of those steps [the service steps set out in the Case Management Order] by a witness statement or certificate of service to be filed at court and uploaded to the Claimants’ dedicated webpages [the pages on the Claimants’ official websites pertaining to the car cruising injunction and providing a wealth of information about that injunction] ... within 7 days of completing those steps. ”*

The final service step was taken on 27 March 2026 (covering Dudley’s logo on car cruising signage in Walsall (as Dudley ceased to be party to the Injunction in March 2026) and a witness statement which the Claimants will aver evidenced compliance with the requisite service steps (“the Compliance Statement”) was duly filed shortly before midday on 2 April (within 7 days).

However, due to an oversight the Claimants did not take steps to upload this witness statement to its webpages until after 6.00 p.m. on 2 April. Due to Friday 3 April and Monday 6 April being Bank Holidays, it was not practicably possible to take steps to upload that witness statement to the Councils’ webpages until the following Tuesday 07 April. The Compliance Statement was uploaded to the Claimants’ website on 07 April (Wolverhampton) and 08 April (Sandwell and Walsall).

The Claimants acknowledge and unreservedly apologise for their slightly late compliance in uploading the Compliance Statement to their Websites. The Claimants further contend this slight delay is of no consequence to the Injunction and that no prejudice is caused to any Defendant (the First to Fourth Defendants) in one or more categories of Persons Unknown or any named Defendants by this slightly late compliance.

The Claimants thus respectfully invite the Court to make an order granting any necessary relief from sanctions and confirming this has no effect on the operation of the Injunction.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- No

## Statement of Truth

The applicant understands that proceedings for contempt of court may be brought against a person 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.

- I believe that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

## Signature



- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

## Date

Day                      Month                      Year

14	04	2026
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Full name

Adam James Richard Sheen

Name of applicant's legal representative's firm

Legal Services Wolverhampton City Council

If signing on behalf of firm or company give position or office held

Acting Lead Lawyer (Litigation)

Applicant's address to which documents should be sent.

Building and street

Civic Centre

Second line of address

St Peter's Square

Town or city

Wolverhampton

County (optional)

West Midlands

Postcode

W	V	1	1	R	G
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If applicable

Phone number

01902 556556

Fax number

DX number

744350 Wolverhampton 27

Your Ref.

LIT/AS/LIJ017753P

Email

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