

Statement of: **Adam Sheen**
Statement no: **2**
Date: **April 2026**
For: **Claimants**
Exhibits: **AJRS2**

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

CLAIM NO: KB-2022-BHM-000188

In the matter of an application for an injunction under s.222
Local Government Act 1972 and s.130 of the Highways Act 1980

B E T W E E N:

- 1. WOLVERHAMPTON CITY COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

Persons Participating in Street Cruises

- 1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3.00 P.M. AND 7.00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE AREA SHOWN ON PLAN B (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

Persons Attending or Intending to Participate in Street Cruises

- 2. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3.00 P.M. AND 7.00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE AREA SHOWN ON PLAN B (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**

Persons Promoting Street Cruises

- 3. PERSONS UNKNOWN PROMOTING, ORGANISING, PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3.00 P.M. AND 7.00 A.M. 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 AREA SHOWN ON PLAN B (ATTACHED)**

Drivers, Riders or Passengers in or on Motor Vehicles who take part in Street Cruises

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3.00 P.M. AND 7.00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE AREA SHOWN ON PLAN B (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. onwards AND THOSE PERSONS LISTED AT SCHEDULE 1 AS NAMED DEFENDANTS

Defendants

WITNESS STATEMENT OF ADAM JAMES RICHARD SHEEN

I, Adam James Richard Sheen of Wolverhampton City Council, Civic Centre, St Peters Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

1. I am a solicitor of the Senior Courts of England and Wales. I qualified as a solicitor in September 2005 and then qualified as a solicitor-advocate (civil) in 2014 and as a solicitor-advocate (criminal) in 2015. I am employed by the First Claimant as a Solicitor-Advocate and Acting Lead Lawyer in the Litigation Team.
2. I have conduct of this matter on behalf of the Claimants and am duly authorised to make this witness statement on the Claimants' behalf. Where possible I make this witness statement from facts and matters within my own knowledge and from my review of the First Claimant's records. Where I have relied on other sources of information, those sources are identified within this witness statement.

3. There is now produced and shown to me a paginated bundle of documents marked "**AJRS2**" which I will refer to in the course of this witness statement. Numbers appearing within square brackets "[...]" refer to the relevant page within the bundle.
4. This witness statement is made in support of an application for relief from sanctions for the late uploading to the dedicated pages of their Websites of the witness statement of Paul Brown (Communications Manager employed by the First Claimant) dated 02 April 2026 such uploading being required per Paragraph 11 of the case management order of Her Honour Judge Emma Kelly 27 February 2026).
5. Following a review hearing on the same day, by the order of Her Honour Judge Emma Kelly 27 February 2026, an Injunction to restrain car cruising within the Claimants' local authority areas (reinforced with a power of arrest) was renewed in varied terms. As this Injunction was made against categories of Persons Unknown, various requirements were set out in an accompanying Case Management order (also made by Her Honour Judge Emma Kelly and dated 27 February 2026) ("the Case Management Order").
6. The purpose of the requisite steps the Claimants were then required to undertake by virtue of the Case Management Order was to bring the Injunction to the attention of Persons Unknown and effect service of the Injunction upon them. A copy of the Case Management Order dated 27 February appears within the bundle of documents exhibited hereto marked **AJRS2** [A1].
7. The Claimants contend that they fully complied with the detailed steps set out in the Case Management Order (covering signage requirements, media releases, uploading of documents to Websites amongst other things) and that the final service step was fulfilled on 27 March 2026. Full details regarding these steps are set out in Paul Brown's witness statement date 02 April 2026. Mr Brown is employed by the First Claimant as a Communications Manager. A copy of Brown's statement appears within the bundle of documents exhibited hereto marked **AJRS2** [A11].

8. The Claimants acknowledge that Paragraph 9 of the Case Management Order of Her Honour Judge Emma Kelly 27 February 2026 required a statement evidencing compliance with the requisite service steps to be filed at court and uploaded to the Claimants' websites by 11.59 p.m. on the seventh day after completion of the final service step). The Claimants thus contend that per paragraph 9 of the Case Management Order Mr Brown's witness statement dated 02 April 2026 was required to be filed at court and copy of this statement was to be uploaded to the Claimants' websites by 11.59 p.m. on Friday 03 April 2026.
9. The statement of Mr Brown dated 02 April 2026, was duly filed at court (via upload by CE-File) on 02 April 2026 at 11.46 hours. A copy of the relevant CE-File confirmation appears within the bundle of documents exhibited hereto marked **AJRS2** [A33].
10. Unfortunately, however, a copy of Mr Brown's statement of 02 April 2026 was not uploaded to the Claimants' Websites until 09.18 hours on Tuesday 7 April (Wolverhampton), 13.16 hours on Wednesday 8 April 2026 (Walsall) and 15.43 hours on Wednesday 8 April 2026 (Sandwell). Copies of the e-mails confirming the times when Mr Brown's statement of 02 April 2026 was uploaded to the Claimants' websites appears within the bundle of documents exhibited hereto marked **AJRS2** [A34 (Wolverhampton); A39 (Sandwell); and A44 (Walsall)].
11. The Claimants also acknowledge and confirm that by e-mail of 11.59 hours on 02 April 2026 from me to the other Claimants' legal services, anti-social behaviour/community safety teams, all Claimants were in receipt of a copy of Mr Brown's witness statement and confirmation of filing the same via CE-File by midday on 02 April 2026. Please see Exhibit **AJRS2** [A48].
12. However, due to an oversight and engagement in other commitments, a reminder of instructions to the other Claimants' legal services teams to effect upload of Mr Brown's witness statement to all the Claimants' Websites was not sent until 18.27 hours on 02 April 2026. Please see Exhibit **AJRS2** [A37].

13. Instructions followed by e-mail from me to the First Claimant's Webmaster Team (the Webmaster Team comprising colleagues with responsibility for modifying and monitoring the First Claimant's Website) at 18.34 hours on 02 April 2026. These instructions requested that upload of Mr Brown's witness statement 02 April 2026 be effected as soon as practicable. Please see Exhibit **AJRS2** [A35].
14. Unfortunately, because Friday 03 April and Monday 06 April 2026 were Bank Holidays, upload to the First Claimant's website was not practicable until Tuesday 07 April (the next working day), but it was indeed effected on 07 April 2026. E-mail confirmation was then received from the other Claimants Wednesday 08 April that the statement of Mr Brown had been uploaded to the Third and Fourth Claimants' websites on 08 April.
15. Whilst the Case Management Order does not contain a sanction, so far as may be necessary, the Claimants seek relief from sanctions.
16. The Claimants recognise that any failure to comply with a court order is a serious matter. The Claimants profusely and unreservedly apologise for their late compliance with the requirements to upload Mr Brown's statement evidencing compliance with the Case Management Order.
17. The Claimants stress they had no intention of blatantly disregarding the deadline for upload of Mr Brown's witness statement and had, to that point, been extremely careful to comply with all the terms of Case Management Order fully and timeously. Missing the requirement to upload Mr Brown's witness statement evidencing compliance to their Websites was an oversight which was realised late in the day (just hours before the deadline for upload was due and outside of working hours) and the Bank Holidays falling on the two subsequent weekdays meant that upload was inevitably going to be late at that point.
18. Whilst not seeking to diminish the seriousness of missing a court deadline, the Claimants would respectfully contend that in complying fully with all other terms of the Case Management Order bringing the renewed and varied injunction to the attention of Persons Unknown, a delay of just over one working day in

publicising the confirmatory evidence that all service steps had been completed, is of little impact on Persons Unknown.

19. On considering all the circumstances of the case, it is respectfully submitted that the slightly late compliance to publicise the confirmatory evidence that service steps had been completed makes little difference to the substantive case or the publicity surrounding the Injunction.

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.

Name: Adam James Richard Sheen

Signed:



Position Held: Solicitor-Advocate (Civil and Criminal) Acting Lead Lawyer,
Litigation, Wolverhampton City Council

Date: 14 April 2026.

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Statement no: **2**
Date: **April 2026**
For: **Claimants**
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EXHIBIT AJRS2

This the document referred to as "AJRS2" in the witness statement of Adam James Richard Sheen dated [] April 2026.