

Claim Form (CPR Part 8)



In the High Court of Justice
Business and Property Courts of England and Wales
Chancery Division Property and Probate List



Claim No.	BL-2018-001973									
Fee Account no.	BL-2018-001973									
Help with Fees – Ref no. (if applicable)	<table><tr><td>H</td><td>W</td><td>F</td><td>-</td><td></td><td></td><td>-</td><td></td><td></td></tr></table>	H	W	F	-			-		
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Claimants

(1) Island Gas Limited (Company Number 04962079) whose registered office is at 7 Down Street, London W1J 7AJ

(2) Dart Energy (East England) Limited (Company Number 06760546) whose registered office is at 7 Down Street, London W1J 7AJ

(3) Andrew David Morrell c/o Dart Energy (East England) Limited, at 7 Down Street, London W1J 7AJ

Defendant(s)

(1) Persons Unknown entering or remaining without the consent of the Claimant(s) on land and buildings shown shaded red on the plans annexed to the claim form

(2) Persons Unknown without the consent of the Claimant(s) interfering with the First and Second Claimant's rights to pass and repass with or without vehicles, materials and equipment over private access roads on land shown shaded blue on the plans annexed to the claim form

(3) Persons Unknown interfering with the right of way enjoyed by the Claimant(s) and each of its and their agents, servants, contractors, sub-contractors, group companies, licensees, employees, partners, consultants and other visitors over land shown shaded pink on the plans annexed to the claim form

Does your claim include any issues under the Human Rights Act 1998? ☒ Yes ☐ No

Details of claim (*see also overleaf*)

Defendant's
name and
address

Persons unknown
(various): N/A

Court fee	£
Legal representative's costs	TBA
Issue date	

Claim no.	
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Details of claim (*continued*)

The Claimants' claim is for an Order that:

SITE 1

1. The First Defendant and each of them are forbidden from entering or remaining upon the land and/or buildings described in and defined as "**Site 1**" in Schedule 2 to the draft order (the "**Order**") and which are shown for illustration purposes shaded red on the plan annexed to Schedule 4 of the Order ("**Site 1**"), and/or from causing damage to, or removing equipment from, Site 1, without the consent of the First Claimant.
2. The Second Defendant and each of them are forbidden from substantially interfering with the First Claimant's rights to use (with or without vehicles and at any time), carry out work on and/or construct, make up and maintain, the private access road on the land adjoining Site 1 (the "**Site 1 Access Route**"), which is shown shaded blue on the plan annexed to Schedule 4 of the Order, including any passing bays and plays for access and egress between Site 1 and the public highway.

SITE 2

3. The First Defendant and each of them are forbidden from entering or remaining upon the land and/or buildings described in and defined as "**Site 2**" in Schedule 2 to the Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 5 of the Order ("**Site 2**"), and/or from causing damage to, or removing equipment from, Site 2 without the consent of the Second Claimant or the Third Claimant.

SITE 3

4. The First Defendant and each of them are forbidden from entering or remaining upon the land and buildings described in and defined as "**Site 3**" in Schedule 2 to the Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 6 of the Order ("**Site 3**"), and/or from causing damage to, or removing equipment from, Site 3 without the consent of the First Claimant.
5. The Second Defendant and each of them are forbidden from substantially interfering with the rights of the First Claimant, and all others authorised by the First Claimant, to pass and re-pass (with or without vehicles and at any time) over the private access road on the land adjoining Site 3 (the "**Site 3 Access Route**"), which is shown shaded blue on the plan annexed to Schedule 6 of the Order, including any passing bays and plays for access and egress between Site 3 and the public highway

The Exclusion Zones

6. In relation to exclusion zones shown shaded pink on the plans annexed to Schedules 7 to 8A of the Order (such zones comprising the primary access ways to Sites 1 to 3) (the "**Exclusion Zones**"), the Third Defendant and each of them are forbidden from carrying out any of the following acts within any of the Exclusion Zones except that this paragraph of the Order shall not apply to any public footpath and/or pavement within either Exclusion Zone:
 - (a) blocking the highway with persons or things with a view to slowing down or stopping traffic, and with the intention of causing inconvenience and delay to the Claimants and/or their visitors;
 - (b) slow walking in front of vehicles with the object of slowing them down, and with the intention of

causing inconvenience and delay to the Claimants and/or their visitors;

- (c) climbing onto vehicles;
- (d) otherwise, unreasonably and/or without lawful authority or excuse, preventing the Claimants and/or their visitors from access to, and/or egress from, any of the Sites;
- (e) otherwise, unreasonably and/or without lawful authority or excuse, obstructing the highway, with the intention of causing inconvenience and delay to the Claimants and/or their visitors.

7. An Order permitting service of Court documents and evidence by an alternative method.

8. Provision to be made for the costs of the claim.

The Claimants rely on the witness evidence referred to in Schedule 1 of the Order.

Statement of Truth

~~*(I believe)~~(The Claimant believes)-that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement

Full name DANIEL OWEN CHRISTOPHER TALFAN DAVIES

Name of claimant's legal representative's firm FIELDFISHER LLP

signed 

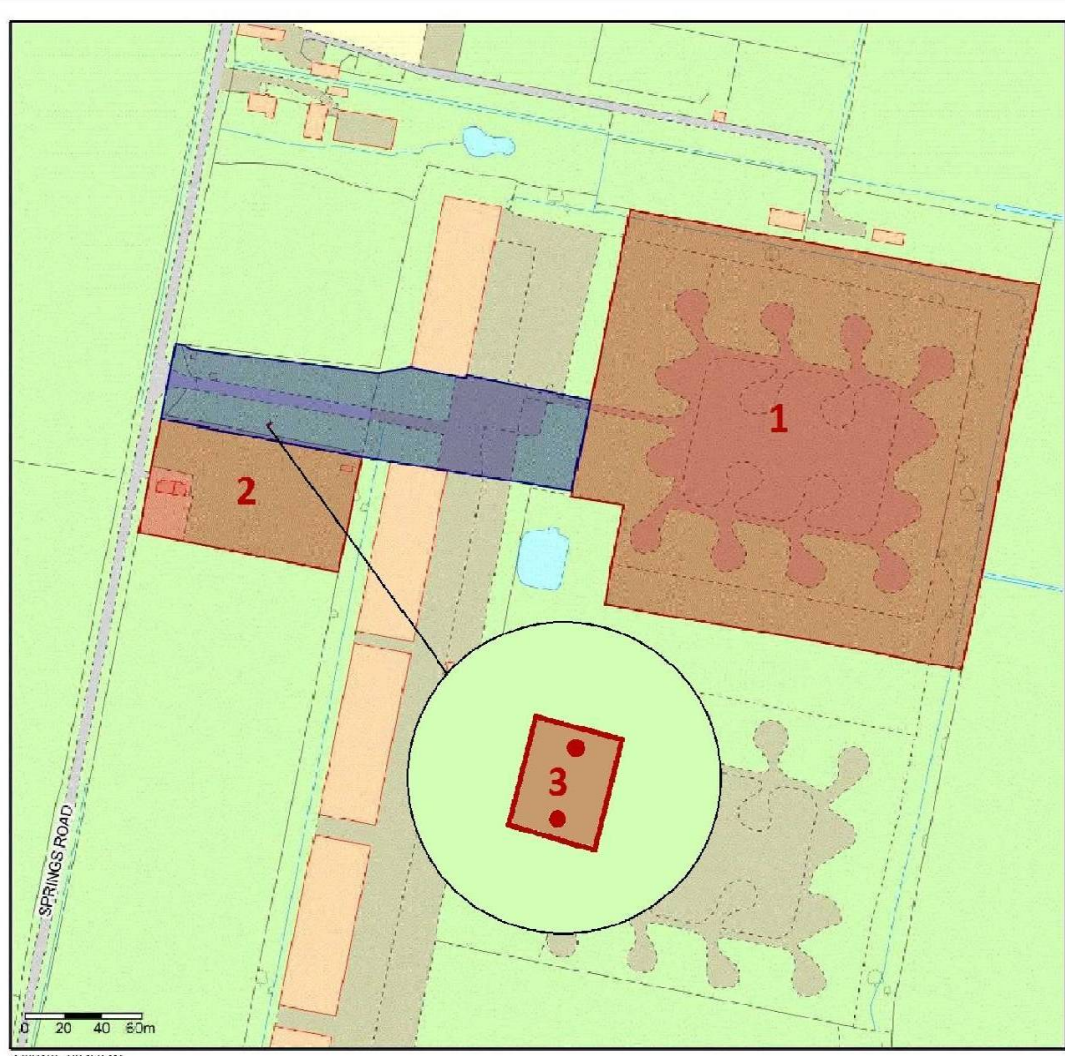
~~*(Claimant)~~(Litigation friend)
(Claimant's legal representative)

position or office held PARTNER
(if signing on behalf of firm or company)

**delete as appropriate*

Fieldfisher LLP
Riverbank House
Swan Lane
London
EC4R 3TT
Ref: OTD/2004719.1

Claimant's or claimant's legal representative's
address to which documents should be sent if
different from overleaf. If you are prepared to accept
service by DX, fax or e-mail, please add details.



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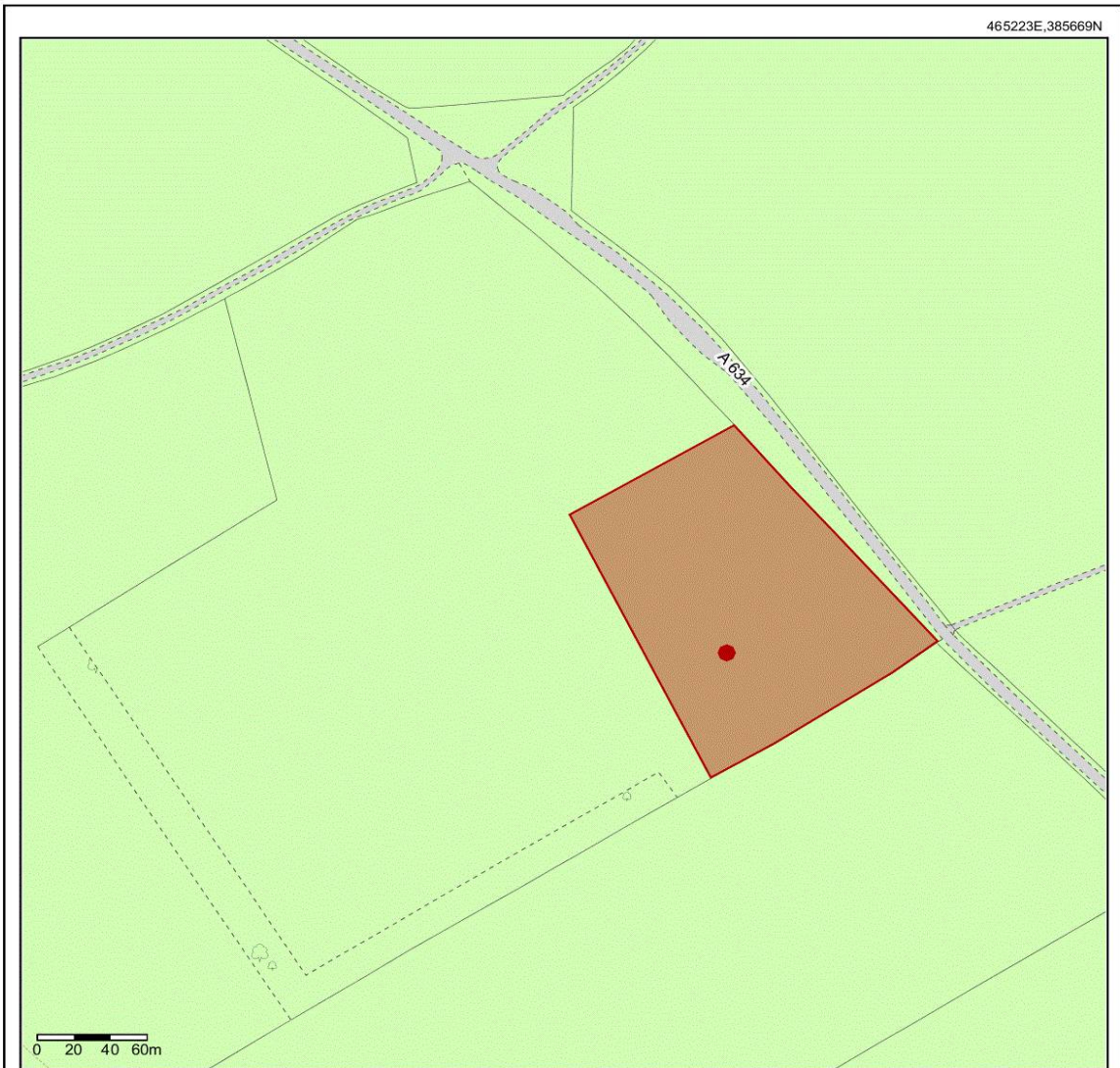


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Land at the Rocket Site, Springs Road, Mission Springs
Nottinghamshire
DN10 6ET



Case Reference: 64340.00023/Site 1



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Land at Retford Road
Worksop



Case Reference: 64340.00023/Site 2

