

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

N244 Application notice (06.22)

© Crown copyright 2022
Reproduced by Thomson Reuters

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.

1. The orders of Coe HHJ Orders are attached, together with the Bourne J Orders.
2. The Bourne J Orders and the Coe HHJ Orders together provide that:
 - a) the injunctions granted pursuant to the Coe HHJ Orders are to be reviewed at 12 month intervals; and
 - b) the hearing at which such review is to be considered is to be listed to “*be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.*”
3. The Claims are defined in the Bourne J Orders as the claims in actions KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”).
4. The Claimants in the remaining Claims also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP, also made applications of even date to the same effect as this application.
5. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

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

I understand 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

2

Month

June

Year

2026

Full name

Alexander James Wright

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Legal Director

Applicant's address to which documents should be sent.

Building and street

Two New Bailey

Second line of address

6 Stanley Street

Town or city

Salford

County (optional)

Postcode

M	3		5	G	X	
---	---	--	---	---	---	--

If applicable

Phone number

+44 161 831 8582

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE:

DATED:

BETWEEN:-

**(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
(4) STANSTED AIRPORT LIMITED
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD**

Claimants

- v -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

ORDER

UPON the Claimants' claim by the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024

AND UPON the making of an injunction by order dated 5 July 2024 by Her Honour Judge Coe K.C. ("the Orders")

AND UPON the review hearings in each of the claims KB-2024-001765, KB-2024-002132, KB-2024-002317 and KB-2024-2473 ("the Claims") having been listed to be heard together on 24 June 2025 ("the 2025 Review Hearing")

AND UPON the Orders dated 24 June 2025 of Bourne J following the hearing of the 2025 Review Hearing in respect of the Claims

AND UPON the Claimants' application dated 2 June 2026 ("the Application")

AND UPON the Court making the order without a hearing on the basis a hearing would not be appropriate

IT IS ORDERED THAT:

1. The Orders shall be reviewed at a hearing on [], with a time estimate of 1 day.
2. The Claimants shall serve the Application and this order on the Defendants by carrying out the steps set out in paragraph 10 of the Orders.
3. A person affected by this order may make an application have to it set aside, varied or stayed within 7 days after the order is served on them.