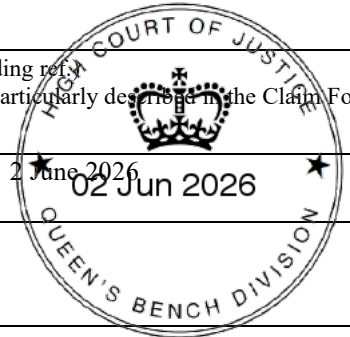


Application notice

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form:
<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court The High Court of Justice King's Bench Division		Claim no. KB-2024-002132	
Fee account no. (if applicable)		Help with Fees – Ref. no. (if applicable)	
		H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)			
Claimant's name (including ref.) Manchester Airport Plc and Others			
Defendant's name (including ref.) Persons unknown (as more particularly described in the Claim Form)			
Date		2 June 2026 02 Jun 2026	



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

Eversheds Sutherland (International) LLP	KB-2024-002132
	Sub Event ID: 30

2. Are you a Claimant Defendant Legal Representative
 Other (please specify) []

If you are a legal representative whom do you represent?

The Claimants

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

An order to list a hearing (time estimate 1 day) to review the injunction made by orders of Her Honour Judge Coe KC dated 5 July 2024 (“the Coe HHJ Orders”) on 24 June 2026 or as close to that date as is convenient for the Court (“the 2026 Review Hearing”). The 2026 Review Hearing to be heard, in accordance with the Orders dated 24 June 2025 of Bourne J (“the Bourne J Orders”), with the review of the injunctions made in each of the claims KB-2024-001765, KB-2024-002132, KB-2024-002317 and KB-2024-2473.

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 remote 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

9. Who should be served with this application?

The Defendants (Persons Unknown)

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