

# 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>

<b>Name of court</b> High Court of Justice (KBD)	<b>Claim no.</b>
<b>Fee account no.</b> (if applicable)	<b>Help with Fees – Ref. no.</b> (if applicable)
PBA0078329	<b>H W F</b> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>
<b>Warrant no.</b> (if applicable)	
<b>Claimant's name</b> (including ref.) Drax Power Limited	
<b>Defendant's name</b> (including ref.) See Schedule 1	
<b>Date</b>	28 July 2024 23 Jul 2024

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

Walker Morris LLP

KB-2024-002361

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

If you are a legal representative whom do you represent?

Claimant

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

(1) An injunction to restrain the Defendants from entering, occupying or remaining on the land defined in the Particulars of Claim and carrying out such other acts as are specified in the draft order; (2) An order to dispense with service of the Claim Form, Particulars of Claim, Application notice, evidence in support and the Order.

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
8. What level of Judge does your hearing need?
9. Who should be served with this application?

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

The Claimant seeks an order dispensing with service. Details of how it proposes to notify persons potentially affected are set out in the witness statement of Nicholas McQueen and the draft order

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.

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.

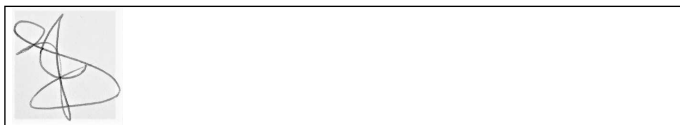
No

# 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                      Month                      Year

2	3	0	7	2	0	2	4
---	---	---	---	---	---	---	---

Full name

James Damarell

Name of applicant's legal representative's firm

Walker Morris LLP

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

Senior Associate

Applicant's address to which documents should be sent.

Building and street  
33 Wellington Street

Second line of address

Town or city  
Leeds

County (optional)

Postcode

L	S	1		4	D	L
---	---	---	--	---	---	---

If applicable

Phone number  
0113 283 2500

Fax phone number

DX number

Your Ref.  
JQD/NLM/DRA04079.36

Email

## **SCHEDULE 1**

- (1) PERSONS UNKNOWN WHO IN CONNECTION WITH RECLAIM THE POWER, AXE DRAX OR OTHER ENVIRONMENTAL CAMPAIGN ENTER OCCUPY OR REMAIN ON THE LAND SHOWN SHADED BLUE ON PLAN 1 OR LAND SHOWN SHADED BLUE ON PLAN 2 BEING LAND WITHIN OR ADJOINING DRAX POWER STATION, SELBY AND ITS ASSOCIATED PUMPING STATION WITHOUT THE CONSENT OF THE CLAIMANT**
- (2) PERSONS UNKNOWN WHO IN CONNECTION WITH RECLAIM THE POWER, AXE DRAX OR OTHER ENVIRONMENTAL CAMPAIGN CONGREGATE OR ASSEMBLE ON THE LAND SHOWN SHADED RED ON PLAN 1 AND PLAN 2 INCLUDING THE VERGE AND FOOTWAY ON THE WESTERN SIDE OF NEW ROAD, SELBY, VERGE TO THE NORTH OF THE FOOTWAY ON THE A645, AND PUBLIC FOOTPATH TO THE NORTH AND WEST OF AND PASSING IN A FENCED CHANNEL THROUGH DRAX POWER STATION**
- (3) PERSONS UNKNOWN WHO IN CONNECTION WITH RECLAIM THE POWER, AXE DRAX OR OTHER ENVIRONMENTAL CAMPAIGN OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OSBTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM DRAX POWER STATION WITH OR WITHOUT VEHICLES INCLUDING RAIL TRAFFIC BY THE CLAIMANT, ITS AGENTS, EMPLOYEES, CONTRACTORS OR OTHER LICENSEES**
- (4) PERSONS UNKNOWN CAUSING OR PERMITTING THE FLYING OF A DRONE OR DRONES ABOVE THE LAND SHOWN SHADED BLUE AND SHADED RED ON PLAN 1 BEING DRAX POWER STATION AND ADJOINING LAND.**