


N244

# Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

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<b>Name of court</b> High Court of Justice (KBD)	<b>Claim no.</b> KB-2024-002210
<b>Fee account no.</b> (if applicable) PBA0076972	<b>Help with Fees - Ref. no.</b> (if applicable) H W F - [ ] [ ] - [ ] [ ]
<b>Warrant no.</b> (if applicable)	
<b>Claimant's name</b> (including ref) Heathrow Airport Limited	
<b>Defendant's name</b> (including ref) "Persons Unknown" (as defined as the Defendants to the Claim)	
<b>Date</b>	16 September 2024

KB-2024-002210

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

Bryan Cave Leighton Paisner LLP

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?

The Claimant seeks an order joining 26 defendants as named defendants to these proceedings, in circumstances where each is alleged to have committed acts in breach of the without notice injunction dated 9 July 2024 prohibiting acts of trespass at Heathrow Airport in connection with Just Stop Oil or other environmental campaign. Full details of that alleged conduct is set out in the Second Witness Statement of Akhil Markanday filed in support of this application.

The Claimant also seeks orders (pursuant to CPR r.6.15, 6.27 and 81.4(2)(c)) (to the extent required) for alternative service of this application, any order made and other documents in these proceedings (including anticipated contempt applications), and case management directions for the future conduct of these proceedings. The directions sought are set out in the draft 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? Is this time estimate agreed by all parties?  
 Hours  Minutes  
 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?

N/A – see 9a. below

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 for alternative service pursuant to CPR r6.15 and 6.27. Details of how it proposes to notify persons affected are set out in the Second Witness Statement of Akhil Markanday filed in support of this application.

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

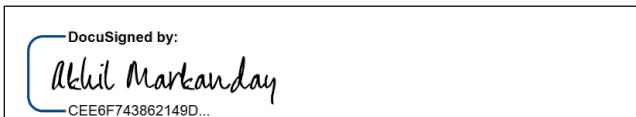
# Statement of Truth

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
16	September	2024

## Full name

Akhil Markanday

## Name of applicant's legal representative's firm

Bryan Cave Leighton Paisner LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

Governor's House

Second line of address

5 Laurence Pountney Hill

Town or city

London

County (optional)

Postcode

E C 4 R D B R

If applicable

Phone number

020 3400 4344

Fax phone number

DX number

Your Ref.

AMRK/RHOD/20H0904.140

Email

akhil.markanday@bclplaw.com