



# Claim Form

In the	HIGH COURT OF JUSTICE KING'S BENCH DIVISION
Fee Account no.	PBA0087960
Help with Fees - Ref no. (if applicable)	H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>

**You may be able to issue your claim online which may save time and money. Go to [www.moneyclaims.service.gov.uk/make-claim](http://www.moneyclaims.service.gov.uk/make-claim) to find out more.**

For court use only	
Claim no.	
Issue date	

Claimant(s) name(s) and address(es) including postcode  
BIRMINGHAM CITY COUNCIL  
Council House, Victoria Square, Birmingham B1 1BB



Defendant(s) name and address(es) including postcode

Persons Unknown who, in connection with strikes organised by UNITE the Union, and without the consent of the Claimant, either occupy, remain on, or prevent, slow down or otherwise interfere with the entrance of exit of individuals and or vehicles operated from the Claimants Depots ("the Depots") specified in the continuation sheet and/or block or obstruct the Claimant's Waste Collection Vehicles engaged in the provision of waste collection service within the City of Birmingham as set out in the continuation sheet

Brief details of claim

The Defendants are engaged in protest activity in the form of direct action at or adjacent of the Depots which action takes the form of impeding or preventing the Claimant's vehicles and personel from entering or exiting those Depots. In addition, the Defendants have also engaged in direction action by blocking the Claimant's vehicles on the public highway where such vehicles have been able to leave the Depots. The Claimant's seek an injunction to restrain the Defendants **until 1 January 2028** from further engaging in such activity by preventing them from:

- (a) entering, occupying or remaining on the Claimant's land at the Depots;
- (b) blocking, slowing down or otherwise preventing or impeding the Claimant's vehicles from exiting or entering the Depots;
- (c) blocking, slowing down or otherwise preventing or impeding the progress of Claimant's vehicles in the course of their waste collection activities in the City of Birmingham.

The addresses of such Persons Unknown are not known to the Claimant but the Claimant will take the steps set out in the continuation sheet in order to notify the Defendants of the claim documents

Value  
N/A

Defendant's name and address for service including postcode

As above

	£
Amount claimed	N/A
Court fee	646
Legal representative's costs	to be assessed
<b>Total amount</b>	<b>646</b>

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here  
(see notes for guidance)

Birmingham District Registry - King's Bench Division

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

Does, or will, your claim include any issues under the Human Rights Act 1998?

- Yes  
 No

Claim no.

Particulars of Claim

attached

to follow

## Statement of truth

**Note:** you are reminded that a copy of this claim form must be served on all other parties.

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 this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

### Signature

DCarter-Hughes

- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day                  Month                  Year

23                  03                  2026

Full name

DEBORAH CARTER HUGHES

Name of claimant's legal representative's firm

DLA Piper

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

ASSISTANT DIRECTOR LEGAL SERVICES

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

160 Aldersgate Street

Second line of address

Barbican

Town or city

London

County (optional)

Postcode

E C 1 A 4 H T

If applicable

Phone number

020 7349 0296

DX number

33866 Finsbury Square

Your Ref.

36257/120050

Email

Jonathan.Exten-Wright@dlapiper.com  
Euan.Bruce@dlapiper.com

## Continuation Sheet: Claim Form

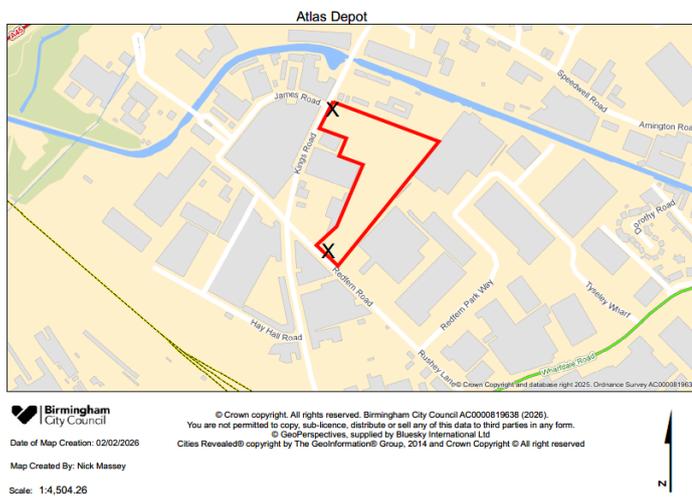
### The Depots:

- (A) Atlas Depot – 70/72 King’s Road, Tylsley, Birmingham B11 2AS
- (B) Lifford Land Depot – Ebury Road, Kings Norton, Birmingham B30 3JJ
- (C) Perry Barr Depot – Holford Drive, Birmingham B42 2TU
- (D) Smithfield Depot – Sherlock Street, Birmingham B5 6HX

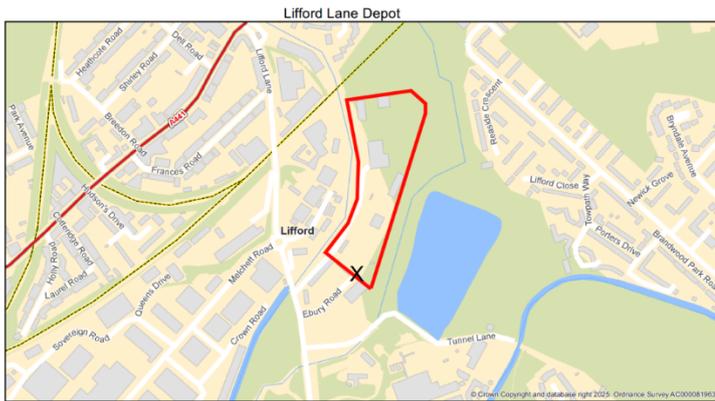
### Steps taken to notify the Defendants

- a) uploading copies of the application documentation onto the following website:  
<https://www.birmingham.gov.uk/WasteInjunctionPersonsUnknown>
- b) sending an email to the following: [neiltodd@Thompsons.law](mailto:neiltodd@Thompsons.law); [sharon.graham@unitetheunion.org](mailto:sharon.graham@unitetheunion.org); [onay.kasab@unitetheunion.org](mailto:onay.kasab@unitetheunion.org); [annmarie.kilcline@unitetheunion.org](mailto:annmarie.kilcline@unitetheunion.org); [enquiries@swp.org.uk](mailto:enquiries@swp.org.uk); [birminghamsocialistparty@gmail.com](mailto:birminghamsocialistparty@gmail.com); [info@reelnews.co.uk](mailto:info@reelnews.co.uk); and [strikemap@gftu.org.uk](mailto:strikemap@gftu.org.uk) stating that a claim has been brought and an application made, and that the Documents can be found at the website
- c) delivering a hard copy of the Documents to Unite the Union at Unite House, 128 Theobalds Road, Holborn, London, WC1X 8TN
- d) affixing a notice at those locations marked with an “x” on the following Plans 1-4:

#### a. **PLAN 1 – ATLAS DEPOT**



**b. PLAN 2 – LIFFORD LANE DEPOT**

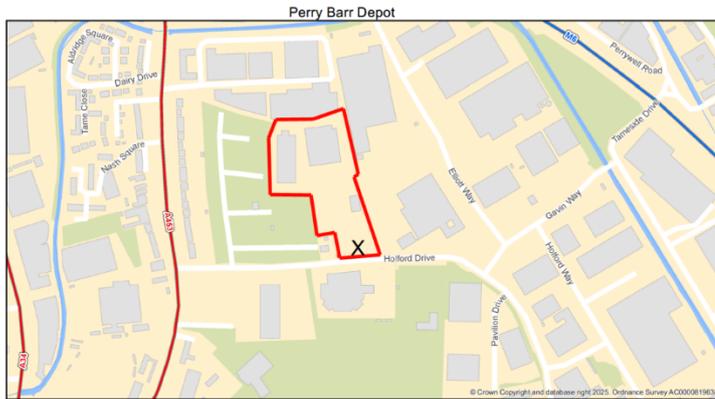


**Birmingham City Council**  
 Date of Map Creation: 02/02/2026  
 Map Created By: Nick Massey  
 Scale: 1:4,504.26

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**c. PLAN 3 – PERRY BARR DEPOT**



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**d. PLAN 4 – SMITHFIELD DEPOT**



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