

On behalf of: Claimant  
By: Deborah Carter-Hughes  
No: Third  
Exhibit: DCH3  
Date: 20 April 2026

**Claim No: KB-2026-BHM-000043**

**IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION**

BETWEEN:

**(1) BIRMINGHAM CITY COUNCIL**

Claimant

- and -

**(1) PERSONS UNKNOWN**

Defendant

---

**WITNESS STATEMENT OF  
DEBORAH CARTER-HUGHES**

---

**I, DEBORAH CARTER-HUGHES**, of The Council House, Victoria Square, Birmingham, B1 1BB **WILL SAY** as follows:

- 1 I am the Assistant Director Legal Services – Corporate Law & Deputy Monitoring Officer at Birmingham City Council (**Council**). I have been in this role since January 2024. I am responsible for leading the Council's internal legal team, ensuring a robust and innovative legal services and lead on complex and high-profile cases for the Council as appropriate. I have been the lead internal legal adviser on the waste strikes since January 2025.
- 2 I am a solicitor of the Senior Courts of England and Wales. I qualified as a solicitor in 2008 and have worked in local government since 2006. Prior to starting at the Council, I was Executive Director at Pathfinder Legal Services, a local authority owned law firm providing legal advice to four founder local authorities.

- 3 This is the third witness statement I have provided in respect of this claim. Unless indicated otherwise, definitions used in my earlier statements are adopted here.
- 4 This statement has been prepared with the assistance of the solicitors for the Claimant, DLA Piper UK LLP ("**DLA**"), through the exchange of emails and videoconferencing meetings. I understand that due to the nature of the application being made by the Council, there is a requirement on myself and the Council to provide a full and frank disclosure in respect of the situation. In preparation of this statement, I have sought to comply with this duty.
- 5 I am duly authorised by the Claimant to make this witness statement on behalf of the Claimant in relation to the ongoing protests affecting the Council's waste collection service for the city and the Council's application for an injunction in respect of the same.
- 6 The facts and matters set out in this statement are true to the best of my knowledge and belief. They are within my own knowledge unless otherwise stated. Where I refer to information supplied by others, the source of the information is identified.
- 7 In making this witness statement I do not intend to waive privilege in any respect and am not authorised by the Claimant to do so.
- 8 There is now produced and shown to me an accompanying exhibit marked "**Exhibit DCH3**". These documents are identified in this witness statement by references to the page numbers in the form "**[DCH3/tab no]**".
- 9 The purpose of this witness statement is to provide an update on the situation in respect of disruption to operations at the Council's waste depots in support of the Claimant's application for an extension to the injunction granted against Persons Unknown. This statement should be read alongside my previous two statements which set out the escalating disruption which led to the Claimant applying for an injunction.
- 10 I have provided this statement in two parts, the first updating the court on disruption since the day of the injunction hearing and the second on the

procedural aspects including notification and service of the claim and order.

## UPDATE ON DISRUPTION

### Disruption on the day of the Court Hearing

- 11 I attended the High Court hearing in Birmingham before Mr Justice Pepperall on 13 February 2026. On the morning of the hearing, there was further disruption at the Perry Barr and Smithfields depots by the Defendants.
- 12 This is captured by the sit-report for the day which confirms that vehicles at Smithfields were delayed from deploying until 10.10 by a large group of 70 or 80 protestors and that a group of 30 or 40 protestors at Perry Barr prevented deployment until 11.00 [DCH3/1].
- 13 The Council had also instructed Expert Investigations via DLA to undertake further leafleting of the Depots on 12 and 13 February 2026, distributing the notice shown at [DCH3/2]. Mr Marriott provided a statement indicating that many of the protestors present at Perry Barr and Smithfields had refused to take the leaflets offered to them and that the group at Smithfields had been abusive towards him [DCH3/3].
- 14 I am also aware of a video published on YouTube by Reel News from the day of the hearing which shows a number of the Defendants blockading vehicles at the Perry Barr depot and then slow walking a line of vehicles down the road as they try to deploy [DCH3/4].
- 15 The video also shows an interview with Paul Jackson, one of the Council's employees who is taking part in the strike with Unite. He states that he is there on strike and to "*show solidarity*" with those who are protesting.
- 16 One of the Defendants in the video (a gentleman wearing a grey buff and an orange Veolia hi-vis jacket, who I recognise from previous videos of the Defendants and I will refer to here as "**Mr Greybuff**") is shown speaking with the driver of a vehicle which is being prevented from departing the depot. In his discussion with the driver he states: "*this may very well be the last time that you see us as there is a High Court hearing today and we expect the court will probably take a dim view of what we've been doing*"

*and tell us to stop*". In my view this demonstrates the Defendant's knowledge that their actions throughout their blockades of the Council's vehicles have been unlawful and were likely to result in an injunction being granted at the hearing on 13 February 2026. The actions of the protestors appear to be a 'last hurrah' before the injunction was granted by Mr Justice Pepperall.

### **Coventry Disruption – 13 March 2026**

- 17 Whilst the injunction has been effective in preventing the blockading of the Claimant's vehicles and premises, there is clear evidence that the Defendants have taken advantage of the fact that the current order is limited in its terms to covering the city of Birmingham only. In response, protestors have on a number of occasions, moved their activities to Coventry.
- 18 On 13 March 2026 an incident arose at the Ryton depot of Tom Whites contractors in Coventry (The Recycling Centre, Stonebrook Way, Longford, Coventry, CV6 6LN). Tom Whites are the waste collection provider for Coventry who have been providing support to Birmingham since last year using their own staff and vehicles.
- 19 The incident involved a group of Defendants blockading the depot and preventing 25 vehicles and crews deploying from the Ryton depot for the purpose of providing waste collection services to Birmingham. This is confirmed by the sit report for the day [DCH3/5].
- 20 A video posted by Reel News shows the disruption taking place [DCH3/6]. The video begins showing the individuals arriving at the depot with the label "*Persons Unknown*" shown on the screen. The group of Defendants then blockade the entrance using flares and a loudspeaker. The video includes wording to the effect that Tom White's vehicles were to be blocked whether or not they were involved in waste collection.
- 21 The video also suggests that the action is being taken against Tom Whites as they are "*scabbing on the bin strike*". In a discussion with a driver, a protestor (who I believe is Mr Greybuff from the Reel News video on 13 February 2025) makes it clear that the protest is due to the Birmingham bin strike and wording on the video then states "*the council got an*

*injunction on Persons Unknown to stop all protests in Birmingham but Coventry wasn't included".*

22 These comments make it clear that it is the same group of Defendants who are responsible for the blockade at the Ryton depot. Their actions here demonstrate that, if the Order against them were to be lifted, they would immediately return to similar blockading of the Council's waste vehicles and depots in Birmingham, purportedly in order to exert leverage over the Council to reach a resolution in the industrial dispute with Unite.

23 Mr Greybuff is also shown in a Twitter post made on the day of disruption blocking a Tom Whites vehicle at the site [DCH3/7].

24 As well as Mr Greybuff, I have also been able to identify the following individuals from the Reel News video:

24.1 One gentleman who attended the hearing on 13 February 2026 and walks with a cane. This gentleman attended late at the hearing and asked to be heard. He indicated that he was an interested member of the public and not one of the protestors. Mr Justice Pepperall considered that as a member of the public was already being heard (Alistair Wingate) and the hearing was well underway, it was not proportionate to hear a second individual. Looking back at other photos, the gentleman's cane is quite distinctive, as are his shoes and jacket, and I recognise him in photos from previous protests at Atlas and Perry Barr on 8, 15 and 21 January 2026 [DCH3/8].

24.2 I also recognise another gentlemen in the Reel News Video and the photo at [DCH3/7] from previous disruption at the Brewery Depot on 30 January 2026 [DCH3/9]. In both images he is wearing the same orange hi-vis jacket, camouflage trousers and flat cap ("**Mr Camouflage**").

### **Coventry Disruption – 24 March 2026**

25 Further protests have taken place at Coventry City Council's offices on 24 March 2026 [DCH3/10]. This did not involve the blockading of any Tom Whites vehicles and appear to have been led by Unite. Press images show Peter Randle and Lee (whose surname I do not know) present at the

protest. Both men are known to me to be national Unite representatives from their involvement in the industrial action in Birmingham. They were also key individuals involved in breaches of the injunction obtained, and still in effect, against Unite for which it has been found in contempt of court and fined £265,000. The article on BBC news also includes comments from Matthew Reid, an employee of the Council and Unite representative.

### **Coventry Disruption – 1 April 2026**

- 26 There was further disruption at the Tom Whites site on 1 April 2026 with Tom Whites vehicles being blockaded by Defendants walking in front of the depot gates. The protesters included individuals who were carrying GMB Union flags, and as of 12:35pm no Coventry crews had been deployed. This is shown by the sit rep for the day [DCH3/11]. Ultimately no Tom Whites vehicles were deployed for the site that day.
- 27 A video of the protest on 1 April 2026 has again been published on YouTube by Reel News [DCH3/12]. Mr Greybuff is again present in the video speaking with Tom Whites' drivers as they are blocked from leaving the site and Mr Camouflage can also be seen in the video as shown by the screenshot at [DCH3/9].
- 28 On this occasion I am unable to identify any other individuals due to the blurring which has been applied to the video.
- 29 The Reel News video also appears to include footage of the Unite protest at Coventry City Council's offices on 24 March 2026.

### **Continuing threat of disruption**

- 30 The injunction has been effective in Birmingham. However, the strike action is ongoing with the current mandate until 9 August 2026. Unite the Union remain under an injunction until trial or further order and it is considered that an extension to this injunction against Persons Unknown is needed to prevent the Defendants returning to their previous strategy of standing in for Unite and causing serious disruption to the delivery of waste services in Birmingham.
- 31 As set out above, it has already been seen that the Defendants have looked for alternative means to circumvent the injunction and it is

considered that were the injunction not extended, they would simply return to disruption by the blocking of bin lorries at the Birmingham depots. The threat of direct action will continue whilst the underlying dispute between the Claimant and Unite has not been resolved. This makes the extension of the injunction not only justified but necessary for the Council to be able to maintain its waste services to the residents of Birmingham.

## **PROCEDURAL MATTERS**

### **Transcript**

- 32 We instructed DLA to appoint a transcription service for the hearing that took place on 13 February 2026. DLA appointed Opus 2 who attended the hearing remotely to take a transcript.
- 33 Following the hearing Opus 2 sent across the transcript which was uploaded on the Council website on 16 February 2026. This was dealt with by my colleagues in the legal team, Julia Lynch (Assistant Director Legal Services – Litigation Law & Deputy Monitoring Officer) as I was on leave in the week of 16 – 20 February 2026. There were some small corrections to the transcript that DLA requested to correct. These were corrected in an updated version which was then uploaded onto the website on 23 February 2026 and the original version was replaced [DCH3/13].

### **Court Judgment**

- 34 On the afternoon of Friday 20 February 2026, the judgment of Mr Justice Pepperall was handed down ("**Judgment**") [DCH3/14]. The Judgment confirmed that an interim injunction would be granted preventing acts of trespass on the Depot sites, obstruction of the Depot entrances and exits and the obstruction of street management vehicles throughout Birmingham.
- 35 Whilst the Judgment had been handed down on 20 February 2026, the sealed order implementing the injunction was not handed down until the afternoon of the following Monday, 23 February 2026 ("**Order**") [DCH3/15].
- 36 Whilst we awaited the Order, the Council immediately took steps to ensure that the Defendants were notified of the Judgment and the anticipated terms of the Order. The Judgment was uploaded to the Webpage on 20

February 2026 and wording was added to the landing page which made clear that the Judgment had been issued.

- 37 Steps were also taken to ensure that the Judgment was publicised on the Council's social media channels [DCH3/16-18].
- 38 The Council also instructed DLA to send emails to Unite and their legal representative (Thompsons Solicitors LLP ("**Thompsons**")) [DCH3/19], Reel News [DCH3/20], Strike Map [DCH3/21], the Socialist Workers Party [DCH3/22] and Birmingham Socialist Party [DCH3/23] to provide notification that the Judgment had been awarded in favour of the Council.
- 39 Due to the timing of the Judgment on Friday afternoon, it was not possible for the Judgment to be displayed at the Depots until the Monday morning. On 22 February, following instruction by my colleague Julia Lynch at the Council [DCH3/24], Christopher Smiles instructed each of the Depot Managers to ensure that the notices regarding the judgment were placed at each of the Depots the following day [DCH3/25]. On 23 February 2026, I received an email from Dean Smith that attached an email from Siobhan Stubbs and confirmed that the notice had been put up at Lifford depot [DCH3/26-27]. The email from Siobhan Stubbs attached the photograph at [DCH3/28]. There was some confusion about what needed to be put up at the depots and, as a result, notices were not put up at the other sites until the following day once we had obtained the Order.
- 40 The Council instructed Arkline Legal Agents via DLA to serve leaflets referring to the Injunction being granted on 20 February 2026 to Persons Unknown at each of the Depots. This was undertaken by Saab Samra of Arkline Legal Agents on 23 February 2026 who attended each of the Depots to hand out the leaflets shown at [DCH3/29]. Mr Samra attended each of the Depots in the following order: Perry Barr, Smithfields, Atlas and Lifford Lane. He has confirmed that he encountered the Defendants at all four Depots and found that many of the protestors refused to accept the leaflets. He therefore left the notices on site and on coffee tables at the Depots. Mr Samra has provided a statement and exhibit regarding his efforts [DCH3/30].

41 All of the notifications outlined above made clear that, whilst the Judgment had been issued, the injunction would only take effect once the terms of the final order were confirmed.

42 On 23 February 2026, DLA delivered a letter and a copy of the Judgment by hand to Unite's head office [DCH3/31]. The image at [DCH3/32] shows the documents being delivered.

**Order, Particulars of Claim, and Application to Amend the Claim Form**

43 On 23 February 2026 the Council, via DLA submitted its Particulars of Claim in respect of the action against the Defendants. Once it had been submitted, this was immediately added to the Webpage.

44 When the Court issued the Order on the afternoon of 23 February 2026, this was also added to the Webpage and further steps were then immediately taken to serve the documentation on the Defendants.

45 The Council instructed DLA to provide further emails to Unite [DCH3/33], Thompsons [DCH3/34], Reel News [DCH3/35], Socialist Workers Party [DCH3/36], Birmingham Socialist Party [DCH3/37] and Strike Map [DCH3/38] to notify them of the filing of the Particulars of Claim and receipt of the Order from the Court.

46 A correction email was sent from DLA to Unite [DCH3/33], Thompsons [DCH3/34], Reel News [DCH3/35], Socialist Workers Party [DCH3/36], Birmingham Socialist Party [DCH3/37] and Strike Map [DCH3/38] on 24 February 2026 to correct the deadline for filing an Acknowledgment of Service and Defence.

47 On 24 February 2026 I emailed the Depot managers to ask them to put up new notices which reflected the Order having been issued as well as the Judgment and there was then some back and forth with the managers to confirm what needed to be put up [DCH3/39]. We then have the following emails to confirm that the updated notice and Order had been affixed for each Depot:

47.1 Perry Barr: Email from Richard Smith confirming the notices were affixed at Perry Barr, with photos of them in place [DCH3/40].

- 47.2 Atlas: Email from David Miller confirming the notices were affixed at Atlas [DCH3/41] and attaching images for each of the gates at the site [DCH3/42-43].
- 47.3 Smithfield: Email from Dean Smith confirming the notices were affixed at Smithfield [DCH3/44] and attaching two images of the Order in place [DCH3/45-46].
- 47.4 Lifford: Email from Siobhan Stubbs confirming the notices were put up [DCH3/47] and attaching three images showing the Order in place [DCH3/48-50].
- 48 We also instructed ESA Risk Ltd via DLA to serve the Particulars of Claim, the Order and a notice confirming details of the Injunction [DCH3/51] on 24 February 2026 at the Atlas, Smithfield, Perry Barr and Lifford Lane Depots. This was undertaken by Saab Samra of ESA Risk Ltd who attended each of the Depots to hand out the Sealed Order and supporting documents. He has confirmed that he encountered Defendants at all four Depots and was able to serve copies of the Sealed Order together with supporting documents. Mr Samra provided a statement and exhibit regarding his efforts at each Depot as follows:
- 48.1 At the Atlas Depot Mr Samra placed 35 bundles on the floor next to a coffee table and described the protestors having 'kicked away' the bundles which dispersed across the pavement [DCH3/52].
- 48.2 At Lifford Lane Depot, Mr Samra left the 15 bundles on a wall adjacent to where the protestors were standing [DCH3/53].
- 48.3 At the Perry Barr Depot, Mr Samra left 15 bundles on a coffee table in front of the protestors with one protestor stating that they would *'dispose of them in the same manner as he had done previously'* [DCH3/54].
- 48.4 At the Smithfields Depot, Mr Samra attempted to place 35 bundles in front of the protestors when a single protestor took the bundles and placed them on his vehicle. As a result, Mr Samra took the bundles and served them by placing them on the floor in front of the Defendants [DCH3/55].

49 On 24 February 2026, the Council posted on its social media with a notification that the Particulars of Claim had been filed with the Court with a link to the Council's website which also contained the Sealed Order. This was posted on the Council's Facebook, LinkedIn, Bluesky and Twitter [DCH3/56].

#### **Amended Claim Form Submission**

50 On 25 February 2026, the Council submitted an application notice, draft order and amended claim form to the Court. The application was to amend the claim form to insert the words "*until 1 January 2028*" in respect of the time limit on the injunction that is sought. The Claim Form was silent in the original form as to the duration being sought [DCH3/57].

51 A copy of the Council's application to amend the claim form and supporting documents were uploaded to the Council's Webpage and made available to the public following submission of the documentation to the Court on 25 February 2026.

37 The following day on 26 February the Council instructed DLA to provide emails to Unite (copied to Thompsons) [DCH3/33], Reel News [DCH3/35], Socialist Workers Party [DCH3/36], Birmingham Socialist Party [DCH3/37] and Strike Map [DCH3/38]. Copies of the application to amend the claim form, draft order and amended claim form, together with a link to the response pack included in the Council's website link were attached to the emails.

38 On 26 February 2026, the Council posted on its social media with a notification to say that the application to amend the claim form had been submitted to specify that injunctive relief is being sought until 1 January 2028. This was posted on the Council's Facebook, LinkedIn, Bluesky and Twitter [DCH3/58].

39 On 27 February 2026 we instructed Expert Investigations via DLA to serve the Notice of an Application to Amend the Claim [DCH3/59]. This was undertaken by Glenn Marriott of Expert Investigations who attended each of the Depots to hand out leaflets to protestors. Mr Marriott attended each of the Depots in the following sequence: Perry Barr, Smithfield, Atlas and Lifford Lane. He has confirmed that there were only 2 protestors present

at the Perry Barr Depot and neither of them took possession of the notice but stated they were fully aware of the content. Mr Marriott has provided a statement and exhibit regarding his efforts [DCH3/60].

- 40 The Court issued an Order granting the application dated 18 March 2026 ("**Claim Form Order**") [DCH3/61]. This was received by DLA on 20 March 2026. As required by the Claim Form Order, the Council asked DLA to submit the amended claim form to the Court and this was done on 23 March 2026 ("**Amended Claim Form**"). The Council then took steps to notify Persons Unknown of the accepted application and Amended Claim Form.
- 41 On 23 March 2026, the Council uploaded the Claim Form Order and the Amended Claim Form to the Webpage.
- 42 The Council also instructed DLA to send notification emails to Unite and their legal representative (Thompsons) [DCH3/33], Reel News [DCH3/35], Strike Map [DCH3/38], the Socialist Workers Party [DCH3/36] and Birmingham Socialist Party [DCH3/37]. The email attached a copy of the Claim Form Order and the Amended Claim Form.
- 43 On 24 March 2026, the Court returned the sealed version of the amended claim form ("**Sealed Claim Form**"). The Council uploaded the Sealed Claim Form to the Webpage, in place of the Amended Claim Form.
- 44 We had instructed Expert Investigations via DLA to serve notice of the order granted for amendment of the claim form in the form at [DCH3/62] ("**Notice of Amendment of Claim Form Order**"). On 24 March 2026, this was undertaken by Mr Marriott and Catherine Dell of Expert Investigations who attended Perry Barr depot, Smithfield depot, Atlas depot and Lifford Lane depot. Mr Marriott has provided a statement and exhibits documenting his visits [DCH3/63].
- 45 Further emails were sent out by DLA on 24 March 2026 providing the Sealed Claim Form to Unite and their legal representative (Thompsons) [DCH3/33], Reel News [DCH3/35], Strike Map [DCH3/38], the Socialist Workers Party [DCH3/36] and Birmingham Socialist Party [DCH3/37].

46 On 23 March 2026, the Council posted on its social media with a notification to say that the application to amend the claim form had been granted to specify that injunctive relief is being sought until 1 January 2028. This was posted on the Council's LinkedIn, Bluesky, Facebook and Twitter [DCH3/64].

### **Monitoring of notices**

47 I have continued to be provided with updates by the Service Managers at each of the Depots who have continued to monitor the notices and confirmed that copies of the relevant notices remain in place:

#### 47.1 Week commencing 23 February 2026

- (a) Smithfield and Lifford Lane Depots: Dean Smith, Cameron Baynes and Siobhan Stubbs continued to monitor the notices at Smithfield and Lifford Lane from 23 February 2026 to 27 February 2026 [DCH3/65].
- (b) Atlas Depot: David Miller provided updated monitoring of notices at Atlas from 23 February 2026 to 01 March 2026 [DCH3/66].
- (c) Perry Barr Depot: Richard Smith and Justin Hilyer continued to monitor the notices remaining in place at Perry Barr from 23 February 2026 to 27 February 2026 [DCH3/67].

#### 47.2 Week commencing 2 March 2026

- (a) Smithfield and Lifford Lane Depots: Cameron Baynes, Siobhan Stubbs and Dean Smith continued to monitor the notices at Smithfield and Lifford Lane from 2 March 2026 to 6 March 2026 [DCH3/68].
- (b) Atlas Depot: David Miller provided updated monitoring of notices at Atlas from 2 March 2026 to 8 March 2026 [DCH3/69].

- (c) Perry Barr Depot: Richard Smith and Justin Hilyer continued to monitor the notices at Perry Barr from 2 March 2026 to 7 March 2026. On 4 March and by human error the Depot Manager forgot to check the notices which is why there was no signature on this date [DCH3/70].

47.3 Week commencing 9 March 2026

- (a) Smithfield and Lifford Lane Depots: Dean Smith and Siobhan Stubbs continued to monitor the notices at Smithfield and Lifford Lane from 9 March 2026 to 13 March 2026 [DCH3/71]. The notices were replaced on 13 March 2026 due to high winds.
- (b) Atlas Depot: David Miller continued to monitor the notices at Atlas between 9 March 2026 and 13 March 2026 [DCH3/72].
- (c) Perry Bar Depot: Richard Smith continued to monitor the notices at Perry Barr between 9 March 2026 and 13 March 2026 [DCH3/73].

47.4 Week commencing 16 March 2026

- (a) Smithfield and Lifford Lane Depots: Dean Smith and Siobhan Stubbs continued to monitor the notices at Smithfield and Lifford Lane from 16 March 2026 to 20 March 2026 [DCH3/74].
- (b) Atlas Depot: Chelsea O Connor and security continued to monitor the notices at Atlas from 16 March 2026 to 23 March 2026 [DCH3/75].
- (c) Perry Barr Depot: Richard Smith continued to monitor the notices at Perry Barr between 16 March 2026 and the morning of the 21 March 2026 [DCH3/76].

47.5 Week commencing 23 March 2026

- (a) Smithfield and Lifford Lane Depots: Dean Smith, Siobhan Stubbs, and Lewis Adams continued to monitor the notices at Smithfield and Lifford Lane from 23 March 2026 to 27 March 2026 [DCH3/77].
- (b) Atlas Depot: David Miller and security continued to monitor the notices at Atlas between 23 March 2026 to 29 March 2026 [DCH3/78].
- (c) Perry Barr Depot: Richard Smith continued to monitor the notices at Perry Barr from 23 March 2026 to 27 March 2026 [DCH3/79].

47.6 Week commencing 30 March 2026

- (a) Smithfield and Lifford Lane Depots: Lewis Adams has continued to monitor the notices at Smithfield [DCH3/80] with input from Siobhan Stubbs for Lifford Lane from 30 March 2026 to 5 April 2026 [DCH3/81].
- (b) Atlas Depot: David Miller and security continued to monitor the notices at Atlas between 30 March 2026 to 5 April 2026 [DCH3/82].
- (c) Perry Barr Depot: Richard Smith continued to monitor the notices at Perry Barr from 30 March 2026 to 5 April 2026 [DCH3/83].

47.7 Week commencing 6 April 2026

- (a) Smithfield and Lifford Lane Depots: Dean Smith and Siobhan Stubbs continued to monitor the notices at Smithfield and Lifford Lane from 6 to 12 April 2026 [DCH3/84].
- (b) Atlas Depot: David Miller and security continued to monitor the notices at Atlas between 6 to 12 April 2026 [DCH3/85].
- (c) Perry Barr Depot: Richard Smith continued to monitor the notices at Perry Barr from 6 to 12 April 2026 [DCH3/86].

47.8 Week commencing 13 April 2026

- (a) Smithfield and Lifford Lane Depots: Dean Smith and Siobhan Stubbs continued to monitor the notices at Smithfield and Lifford Lane from 6 to 17 April 2026 [DCH3/87]
- (b) Atlas Depot: David Miller and security continued to monitor the notices at Atlas between 13 to 17 April 2026 [DCH3/88]
- (c) Perry Barr Depot: Richard Smith continued to monitor the notices at Perry Barr from 13 to 17 April 2026 [DCH3/89]

**Statement of Truth**

48 I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Dated 20 April 2026

Signed by:  
  
3C6B2C2A7A004E8.....

**DEBORAH CARTER-HUGHES**

On behalf of: Claimant  
By: Deborah Carter-Hughes  
No: Third  
Exhibit: DCH3  
Date: 20 April 2026

**Claim No: KB-2026-BHM-000043**

**IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION**

BETWEEN:

**(1) BIRMINGHAM CITY COUNCIL**

Claimant

- and -

**(1) PERSONS UNKNOWN**

Defendant

---

**WITNESS STATEMENT OF  
DEBORAH CARTER-HUGHES**

---

DLA Piper UK LLP  
160 Aldersgate Street  
London  
EC1A 4HT  
United Kingdom  
Tel: +442071537755  
Fax: +442077966666

Ref:  
YAH/EAB/36257/120050/UKM/210986014.14  
Solicitors for the Claimant