

On behalf of: Claimant  
By: Carol Culley  
No: Second  
Exhibit: N/A  
Date: 20 April 2026

**CLAIM NO: KB-2026-BHM-000043**

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

BETWEEN:

**(1) BIRMINGHAM CITY COUNCIL**

Claimant

- and -

**(1) PERSONS UNKNOWN**

Defendant

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**SECOND WITNESS STATEMENT OF  
CAROL CULLEY**

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**I, CAROL CULLEY OBE**, of BIRMINGHAM CITY COUNCIL **WILL SAY** as follows:

- 1 I am employed by Birmingham City Council (**Council**) as the Executive Director of Finance and s.151 Officer. I am the statutory S151 Officer for the Council with responsibility for ensuring sound administration of the Council's financial affairs.
- 2 I joined BCC on 17 March 2025, having previously held roles with Manchester City Council as Deputy Chief Executive and City Treasurer, Best Value Commissioner as part of Government Intervention at Woking Borough Council and I am a past President of the Chartered Institute of Public Finance and Accountancy (CIPFA). I am a qualified CIPFA Accountant.

3 This is the second witness statement I have provided in respect of this claim. Definitions used in my earlier statement are adopted here.

**Cross Undertaking In Damages**


4 As set out in my previous statement it has been explained to me that a cross-undertaking in damages is required to cover any loss suffered by the Defendants in the event that it is established in the future that the injunction sought should not have been granted (**Damages**).

5 As the Council is now seeking an extension of the injunction which is in place, I confirm that the Council's position remains as set out in my previous statement. The Council has funds to meet any Damages arising in respect of the current application and the Commissioners are supportive of the action we are taking.

**Statement of Truth**

6 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:  
  
.....  
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**CAROL CULLEY**

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CAROL CULLEY**

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