

On behalf of: Claimant
By: Deborah Carter-Hughes
No: Five
Exhibit: DCH5
Date: 29 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 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 fifth 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 extension of the injunction against the Defendants 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 DCH5**". These documents are identified in this witness statement by references to the page numbers in the form "**[DCH5/tab no]**".

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9. On 28 April 2026, the Council submitted further hard and electronic copies of documents for use at the hearing, as required by the Hearing Order. These were the hearing bundle, skeleton submissions for the Council and a copy of my own Fourth witness statement outlining the steps taken to notify the Defendants of the Application and the Hearing ("**Additional Documents**").

10. I instructed colleagues to upload the Additional Documents, including my Fourth Witness Statement and the hearing bundle, to the Council's Webpage. The wording on the Webpage was also updated to make clear that documents for use at the Hearing were available. This was done on 28 April 2026.
11. I also asked the managers at each of the Depots to put up a notice at the site confirming that documents had been uploaded to the Webpage. Confirmation was provided by each of the managers that the notices had been put in place:
 - a. Smithfield: Email from Shirley Goddard to Dean Smith [DCH5/1], attaching the photo at [DCH5/2].
 - b. Lifford Lane: Email from Siobhan Stubbs [DCH5/3] attaching the photo at [DCH5/4].
 - c. Atlas: Email from David Miller [DCH5/5] attaching the photos at [DCH5/6-7].
 - d. Perry Barr: Messages from Justin Hillyer on 29 April 2026 via Microsoft Teams [DCH5/8].
12. On 28 April 2026, DLA sent an email to Sharon Graham, Onay Kasab, and Annmarie Kilcline at Unite, copying Neil Todd and William Webb of Thompsons Solicitors [DCH5/9] to remind them of the Hearing and confirm that the Council lodged a copy of the hearing bundle and other documents with the Court. DLA also sent emails to Strike Map [DCH5/10], the Socialist Workers Party [DCH5/11], Reel News [DCH5/12], and Birmingham Socialist Party [DCH5/13] to confirm the same details.

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13. I instructed DLA to appoint Tremark to hand out leaflets in the form at [DCH5/14] confirming that the Council had submitted additional documentation for the Court to use at the Hearing. Confirmation has been provided that this was undertaken by Saab Samra and he has provided a statement confirming his service of the documents [DCH5/15].

14. Tremark have been further instructed to carry out further leafleting tomorrow to ensure that all possible steps are taken to make the Defendants aware of the Hearing.
15. On 29 April 2026, the Council posted on its social media to confirm the details of the Hearing and provide a link to the Council's Webpage. The posts were made on Facebook, X, Bluesky and LinkedIn [DCH5/16].
16. As well as this further statement from myself, a statement is being prepared by Anthony Cox, the Council's City Solicitor (Monitoring Officer). It is intended that both statements will be filed at Court today by DLA. Once filed, both statements will be added to the Webpage. I have also asked DLA to then send further emails to Unite, Strike Map, Reel News, the Socialist Workers Party and Birmingham Socialist Party to flag further documents being uploaded to the Webpage.

Statement of Truth

17. 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: 29 April 2026

Signed by:

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DEBORAH CARTER-HUGHES

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