

IN THE HIGH COURT  
OF JUSTICE KING'S  
BENCH DIVISION  
BIRMINGHAM  
DISTRICT REGISTRY

BEFORE [INSERT]

DATED [X]

BETWEEN:

BIRMINGHAM CITY COUNCIL

Claimant

-and-

PERSONS UNKNOWN WHO, IN SUPPORT OF STRIKES ORGANISED BY UNITE THE UNION  
AND WITHOUT THE CLAIMANT'S CONSENT

(1) ENTER OCCUPY OR REMAIN ON, OR BLOCK OR OBSTRUCT THE ENTERING OR  
EXITING OF ANY OTHER INDIVIDUAL OR VEHICLE TO OR FROM THE FOLLOWING  
LOCATIONS:

- (A) ATLAS DEPOT, 70/72 KINGS ROAD, TYSELEY, BIRMINGHAM, B11 2AS
- (B) LIFFORD LANE 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

AND/OR

(2) BLOCK OR OBSTRUCT ANY OF THE CLAIMANT'S STREET MANAGEMENT VEHICLES  
INCLUDING BUT NOT LIMITED TO; WASTE COLLECTION VEHICLES, STREET SCENE,  
TRADE WASTE AND CLINICAL WASTE VEHICLES WITHIN THE CITY OF BIRMINGHAM

Defendants

---

ORDER

---

UPON the Claimant's application dated 12 May 2026 for an order that these proceedings should proceed hereafter under CPR Part 8 ("the Part 8 Application").

AND UPON the Claimant notifying Persons Unknown of the Part 8 Application by carrying out each of the following steps (a) uploading copies of the application form and this draft Order ("the Documents") onto the following website: <https://www.birmingham.gov.uk/WasteInjunctionPersonsUnknown> (the "Website") with

the notice of the hearing dated [date] being uploaded to the Website on [date], additional evidence being uploaded on [date] in advance of the hearing which took place on [date] (the "**Hearing**") (b) on [date] 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 [strikeamap@gftu.org.uk](mailto:strikeamap@gftu.org.uk) (the "**Third Parties**") stating that the Part 8 Application has been made, and that the Documents can be found at the Website (c) on [date] sending emails to the Third Parties to notify them of the Hearing and providing a copy of the Court's Hearing Order; (d) on [date] delivering a hard copy of the Documents to Unite the Union at Unite House, 128 Theobalds Road, Holborn, London, WC1X 8TN (e) on [date] affixing a notice at those locations marked with an "x" on Plans 1-4 setting out that these documents can be found on the Website and updating the notices from [date] to include details of the Hearing and displaying the notice of the Hearing also, with checks being undertaken by the Claimant on a daily basis to ensure that the notices remained in place (f) on [date] publishing on the Claimant's social media channels that the Part 8 Application has been made and that the Documents can be accessed on the Website and publishing further updates on [date] to include details of the Hearing; (g) leafleting of persons in attendance at the Premises to notify them of the Part 8 Application and the Hearing on [dates].

**AND UPON** hearing counsel for the Claimants at a Hearing

**IT IS ORDERED THAT** these proceedings shall continue hereafter as if they had been issued under CPR Part 8 and as if the Claimant had not used the Part 7 procedure.

### **VARIATION**

1. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application, the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
2. Any person applying to vary or discharge this Order must provide the court and the Claimant's solicitors with their full name, address and address for service.

### **SERVICE AND NOTIFICATION**

3. The Order shall be deemed to have been served pursuant to r.6.27 on the Existing Protesters and any further Defendants who attend in the vicinity of the depot gates at any of the Premises while the notices referred to in paragraph (c) below remain affixed to such entrance upon the Claimant carrying out each of the following steps:
  - a. Uploading a copy of the Order onto the Website.

- b. Sending an email to [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), attaching in each case a copy of this Order.
- c. Affixing a copy of the Order in A4 size at the entrance to each of the Premises along with a notice directing the Defendants to the Website.
- d. Distributing leaflets at each of the Premises notifying those present in the vicinity of the depot gates of the granting of the Order and giving details of the Website.
- e. Publishing details of the Order on the Claimant's social media channels and that the Order can be accessed on the Website.

#### **FURTHER DIRECTIONS**

- 4. Liberty to apply.
- 5. Costs are reserved.

#### **COMMUNICATIONS WITH THE CLAIMANT**

- 6. The Claimants solicitors and their contact details are:

DLA Piper UK LLP  
160 Aldersgate Street  
London  
EC1A 4HT  
Telephone: 0207 3490296

Contact names: Euan Bruce

Out of hours contact no: 07738295509 (Euan Bruce)

Email [SM-BCCInjunction@dlapiper.com](mailto:SM-BCCInjunction@dlapiper.com)

**SCHEDULE 1 – PLANS 1-4 – PLANS OF THE PREMISES BEING  
THE CLAIMANT’S DEPOTS**

**PLAN 1 – ATLAS DEPOT**



Date of Map Creation: 02/02/2026

Map Created By: Nick Massey

Scale: 1:4,504.26

© Crown copyright. All rights reserved. Birmingham City Council AC0000819638 (2026).  
You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.  
© GeoPerspectives, supplied by Bluesky International Ltd  
Cities Revealed® copyright by The GeoInformation® Group, 2014 and Crown Copyright © All right reserved



**PLAN 2 – LIFFORD LANE DEPOT**

Lifford Lane Depot



Date of Map Creation: 02/02/2026

Map Created By: Nick Massey

Scale: 1:4,504.26

© Crown copyright. All rights reserved. Birmingham City Council AC0000819638 (2026).  
You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.  
© GeoPerspectives, supplied by Bluesky International Ltd  
Cities Revealed® copyright by The GeoInformation® Group, 2014 and Crown Copyright © All right reserved



**PLAN 3 – PERRY BARR DEPOT**

**Perry Barr Depot**



Date of Map Creation: 02/02/2026

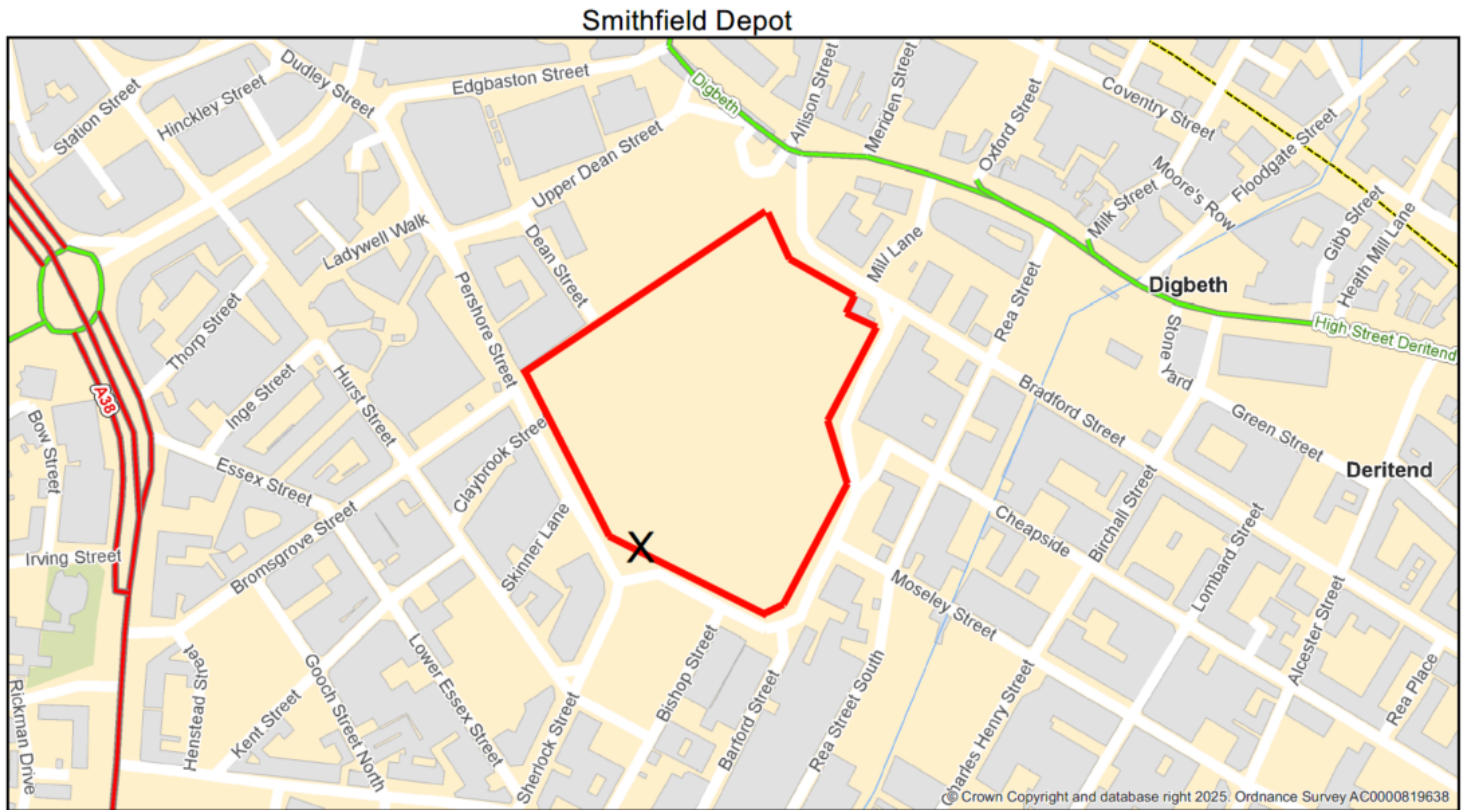
Map Created By: Nick Massey

Scale: 1:4,504.26

© Crown copyright. All rights reserved. Birmingham City Council AC0000819638 (2026).  
You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.  
© GeoPerspectives, supplied by Bluesky International Ltd  
Cities Revealed® copyright by The GeoInformation® Group, 2014 and Crown Copyright © All right reserved



# PLAN 4 – SMITHFIELD DEPOT



Date of Map Creation: 02/02/2026

Map Created By: Nick Massey

Scale: 1:4,504.26

© Crown copyright. All rights reserved. Birmingham City Council AC0000819638 (2026).  
You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.  
© GeoPerspectives, supplied by Bluesky International Ltd  
Cities Revealed® copyright by The GeoInformation® Group, 2014 and Crown Copyright © All right reserved

