

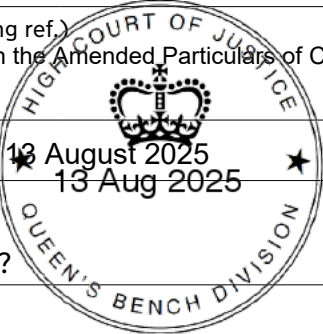
N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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Name of court High Court of Justice (KBD)		Claim no. KB-2024-002596	
Fee account no. (if applicable) PBA0076972		Help with Fees – Ref. no. (if applicable) HWF- - - - -	
Warrant no. (if applicable)			
Claimant’s name (including ref.) (1) London Southend Airport Company Limited, (2) London Southend Solar Limited, (3) Thames Gateway Airport Limited			
Defendant’s name (including ref.) Persons Unknown as defined in the Amended Particulars of Claim			
Date		13 August 2025 13 Aug 2025	



1. What is your name or, if you are a legal representative, the name of your firm?
Bryan Cave Leighton Paisner LLP
KB-2024-002596

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative
☐ Other (please specify)

Sub Event ID: 10

If you are a legal representative whom do you represent?
Claimants

3. What order are you asking the court to make and why?
An order to continue the injunction granted by the Order of Farbey J dated 14 August 2024. Please see further information in box 10 below.

4. Have you attached a draft of the order you are applying for? ☐ Yes ☒ No

5. How do you want to have this application dealt with?
☒ at a hearing ☐ without a hearing
☐ at a remote hearing

6. How long do you think the hearing will last?
1 Hours 30 Minutes
Is this time estimate agreed by all parties? ☐ Yes ☒ No

7. Give details of any fixed trial date or period
22 October 2025

8. What level of Judge does your hearing need?
High Court Judge

9. Who should be served with this application?
N/A (see box 9a below)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.
The Claimants will serve pursuant to the requirements set out at paragraph 9 of the Order of Farbey J dated 14 August 2024.

10. What information will you be relying on, in support of your application?

- ☐ the attached witness statement
- ☐ the statement of case
- ☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

Paragraph 3 of the Order of Farbey J dated 14 August 2024 (the "Order") requires that an annual review hearing be arranged. On 11 March 2025, the Claimants wrote to the Court to request such hearing be listed in accordance with the Order. A hearing was duly listed for 22 October 2025, in person before a High Court Judge, for a time of 1.5 hours.

Paragraph 3 of the Order also refers, at the end, to the Claimants having "applied" for the review hearing. In the event that this should be interpreted as the Claimants having made a formal application on form N244, the Claimants are therefore doing this (despite the hearing already being listed) for the sake of good order.

The Claimants respectfully request a sealed copy of the this application notice, and that the existing hearing be preserved.

Directions on further evidence and filing deadlines have already been set in paragraph 3 of the Order, and the Claimants intend to follow those in due course.

11. 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.

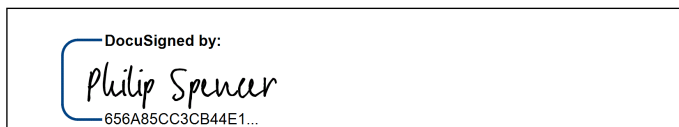
☒ No

Statement of Truth

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 section 10 (and any continuation sheets) are true.
- ☒ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☒ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
1 3	0 8	2 0 2 5

Full name

Philip Keith Spencer

Name of applicant's legal representative's firm

Bryan Cave Leighton Paisner LLP

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

Senior Associate

Applicant's address to which documents should be sent.

Building and street

Governor's House, 5 Laurence Pountney Hill

Second line of address

Town or city

London

County (optional)

Postcode

E	C	4	R	0	B	R
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If applicable

Phone number

Fax phone number

DX number

Your Ref.

AMRK/PSPE/3014634.1

Email

phil.spencer@bclplaw.com