

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Notice of hearing

Application will be heard at 7 Rolls Buildings London EC4A 1NL
 Date: 12th September 2017
 Time: Not before 10:30am
 Court: 10

In the HIGH COURT OF JUSTICE, CHANCERY DIVISION	
Claim no.	HC-2017--002125 31 Jul 2017
Fee account no. (if applicable)	
	H W F -
Warrant no. (if applicable)	HC-2017-002125
Claimant's name (including ref.)	(1) INEOS UPSTREAM LIMITED (2) INEOS 120 EXPLORATION LIMITED (3) INEOS PROPERTIES LIMITED (4) INEOS INDUSTRIES LIMITED (5) JOHN BARRIE PALFREYMAN (6) ALAN JOHN SKEPPER (7) JANETTE MARY SKEPPER (8) STEVEN JOHN SKEPPER (9) JOHN AMBROSE HOLLINGWORTH (10) LINDA KATHARINA HOLLINGWORTH Ref: OTD/64340.00002
Defendant's name (including ref.)	(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON LAND AND BUILDINGS SHOWN SHADED RED ON THE PLANS ANNEXED TO THE AMENDED CLAIM FORM (2) PERSONS UNKNOWN INTERFERING WITH THE FIRST AND SECOND CLAIMANTS' RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ON LAND SHOWN SHADED ORANGE ON THE PLANS ANNEXED TO THE AMENDED CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANT(S)



		<p>(3) PERSONS UNKNOWN INTERFERING WITH THE RIGHT OF WAY ENJOYED BY THE CLAIMANT(S)/OR ITS AFFILIATES AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS, FAMILY MEMBERS AND FRIENDS OVER LAND SHOWN SHADED PURPLE ON THE PLANS ANNEXED TO THE AMENDED CLAIM FORM</p> <p>(4) PERSONS UNKNOWN PURSUING ANY COURSE OF CONDUCT SUCH AS AMOUNTS TO HARASSMENT OF THE CLAIMANTS AND ANY THIRD PARTY CONTRARY TO THE PROTECTION FROM HARASSMENT ACT 1997 WITH THE INTENTION SET OUT IN PARAGRAPH 10 OF THE ORDER</p> <p>(5) PERSONS UNKNOWN COMBINING TOGETHER TO COMMIT THE UNLAWFUL ACTS AS SPECIFIED IN PARAGRAPH 11 OF THE ORDER WITH THE INTENTION SET OUT IN PARAGRAPH 11 OF THE ORDER</p>
Date		31 July 2017

1. What is your name or, if you are a solicitor, the name of your firm?

Fieldfisher LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a solicitor whom do you represent?

The Claimants

3. What order are you asking the court to make and why?

For the reasons set out in the evidence submitted on behalf of the Claimants and appended to its Application Notice dated 26 July 2017, the Claimants are seeking a final Order giving effect to the terms of the Interim Order dated 28 July 2017 made by Mr Justice Morgan (a copy of which is enclosed).

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 (See response to 7 below) without a hearing

[] at a telephone hearing

6. How long do you think the hearing will last?

[] Hours [] Minutes

Is this time estimate agreed by all parties?

[] Yes [] No

7. Give details of any fixed trial date or period

By an order granted by Mr Justice Morgan dated 28 July 2017, a return date hearing was listed for 12 September 2017

8. What level of Judge does your hearing need?

High Court Judge (Mr Justice Morgan)

9. Who should be served with this application?

N/A

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

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

the attached witness statement

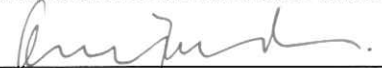
the statement of case

the evidence set out in the box below

Please see paragraph 3 above.

Statement of Truth

The applicant believes that the facts stated in this section (and any continuation sheets) are true.

Signed 
Applicant's Legal Representative

Dated: 31 July 2017

Full name DANIEL OWEN CHRISTOPHER TALFAN DAVIES

Name of applicant's legal representative's firm: FIELDFISHER LLP

Position or office held: PARTNER
(if signing on behalf of firm or company)

11. Signature and address details

Signed 
Applicant's Legal Representative

Dated: 31 July 2017

Position or office held: PARTNER
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

Fieldfisher LLP
Riverbank House

If applicable	
Phone no.	020 7861 4000

2 Swan Lane London Postcode E C 4 R 3 T T	Fax no.	020 7488 0084
	DX no.	
	Ref no.	OTD/64340.00002

E-mail address	
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