

Name of Court	<b>IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION</b>
Claim No.	<b>QB 2019-002783</b>
Fee account no. (if applicable)	<b>PBA0087727</b>
Help with Fees - Ref no. (if applicable)	□□□ - □□□ - □□□
Warrant No (if applicable)	
Claimant's Name (including reference)	<b>BUCKINGHAMSHIRE COUNCIL</b>
Defendant's Name (including reference)	<b>(1) PERSONS UNKNOWN OCCUPYING LAND (2) PERSONS UNKNOWN DEPOSITING WASTE OR FLY-TIPPING ON LAND</b>
Date	<b>9<sup>th</sup> April 2020</b>

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

**LEGAL SERVICES, BUCKINGHAMSHIRE COUNCIL**

2. Are you a  Claimant  Defendant  Legal Representative

Other (please specify)

If you are a solicitor who do you represent

**The Claimant**

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

**To adjourn the final injunction hearing listed 22<sup>nd</sup> April 2020 to the first open date after 30<sup>th</sup> September 2020**

**Service of the Order be dispensed with save for a copy of the Order being e-mailed to the London Gypsy & Travellers Group and posted on the Claimant's website.**

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

5. How do you want this application dealt with  at a hearing  without a hearing  
 at a telephone hearing

6. How long do you think the hearing will last  hour  minutes  
Is this time estimate agreed by all the parties  Yes  No

7. Give details of any fixed trial date or period

22<sup>nd</sup> April 2020

8. What level of judge does your hearing need

Judge

9. Who should be served with this application

Without Notice

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

N/A

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

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

If necessary please continue on a separate sheet

**The Hearing of the application for a final injunction in this matter is due to take place on 22<sup>nd</sup> April 2020.**

**Obviously due to the present National Health Emergency and the restrictions put in place by the Government to curtail all but essential travel and attendance in public places, the continuation of the hearing at Court should not take place.**

**The Claimant approached the London Gypsies & Travellers Group (a body that supports the interest of the Gypsy & Traveller Community) on 25<sup>th</sup> March 2020 suggesting that the hearing be adjourned to the first open date after 30<sup>th</sup> September 2020, no response has been received.**

**Holding the hearing by skype or telephone is not practical because of the possibility of Persons Unknown wishing to attend at Court.**

**In light of the above, the Claimant respectfully seeks an adjournment of the 22<sup>nd</sup> April 2020 hearing on the terms of the attached Order so that the interim Injunction can continue until the adjourned hearing date or further Order.**

**Since service on all the protected sites is impossible due to the restrictions placed on travel (service not being a necessity) it is respectfully requested that in these particularly demanding circumstances, service on the sites be dispensed with and that service of a**

copy of the Order be deemed sufficiently served by e-mailing to the London Gypsy & Travellers Group and by posting on the Claimant's web site.

As soon as circumstances in the country change the Claimant will re-serve all the Sites with the new Order.

**Statement of Truth**

The applicant believes that the facts stated in this Application 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.'

Signed  Dated 9<sup>th</sup> April 2020  
Applicant(s Solicitor)(s Litigation Friend)

Full Name Kiran Kumari Khanna

Name of Applicant's Solicitor's Firm Legal Services, Buckinghamshire Council

Position or office held Principal Solicitor  
(if signing on behalf of the company)

11. Signature and address details

Signed  Dated 9<sup>th</sup> April 2020  
Applicant(s Solicitor) (s Litigation Friend)

Position or office held Principal Solicitor  
(if signing on behalf of the company)

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

<b>LEGAL SERVICES, BUCKINGAMSHIRE COUNCIL, QUEEN VICTORIA ROAD, HIGH WYCOMBE, BUCKINGHAMSHIRE,</b>	if applicable		
	Tel No.	01494-421264/421253	
	Fax No.		
	DX No.	4411 High Wycombe	
Postcode	<b>HP11 1BB</b>	Ref:	AT/6131

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