

Party: Claimants
Witness: S S Wortley
Statement: Second
Exhibits: None
Date: 15.12.2022

Claim No: KB-2022-004824

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) QUINTAIN (WEMBLEY RETAIL PARK) LIMITED
(2) WEMBLEY NE02 INVESTMENTS LIMITED
(3) WEMBLEY NE03 INVESTMENTS LIMITED
(4) JOHN SISK & SON (HOLDINGS) LIMITED

Claimants

and

PERSONS UNKNOWN ENTERING OR REMAINING AT
THE PROPERTY DESCRIBED IN THE DETAILS OF
CLAIM WITHOUT THE CLAIMANTS' PERMISSION

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I, STUART SHERBROOKE WORTLEY of One Wood Street, London, EC2V 7WS WILL SAY as follows:-

1. I make this further witness statement to support of the Claimants' application to for an injunction to prevent urban explorers from trespassing on the Construction Site (as defined in the Details of Claim).
2. I am informed by Ahmed Barkatali and believe that:-
 - 2.1 on Wednesday 21 December 2022, the Fourth Claimant will cease working on the Construction Site for the Christmas holiday period;

- 2.2 thereafter the Construction Site will be closed for 2 weeks;
- 2.3 the Claimants are concerned that during the Christmas holiday period the Construction Site will be particularly vulnerable to urban exploring activity given the lack of activity on the site during working hours;
- 2.4 the Claimants' application for an injunction is urgent as if the application is successful, before it is effective the Claimants will need to arrange for warning notices (in the form approved by the Court) to be printed on suitable (permanent / weatherproof) materials and affixed around the perimeter of the Construction Site;
- 2.5 the printing company (Octink) have informed Mr Barkatali that in order to print the warning notices on Monday 19 December 2022, they would need to receive the final form of notice on Friday 16 December 2022.

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.

I am duly authorised to make this statement on behalf of the Claimants.



Stuart Sherbrooke Wortley

15 December 2022