

BETWEEN:

- (1) QWR Properties NW07 Limited
- (2) Wembley NW07 Investments Limited
- (3) QWR Properties NW09 Limited
- (4) QWR Properties E01 Limited
- (5) QWR Properties E03 Limited
- (6) QWR Properties E05 Limited
- (7) QWR Properties SW03A Limited
- (8) QWR Properties NE02 Limited
- (9) QWR Properties NE03 Limited

Claimants

-and-

PERSONS UNKNOWN ENTERING OR REMAINING ON ANY PART OF THE QUINTAIN BTR ESTATE,
WEMBLEY PARK WITHOUT THE CONSENT OF THE CLAIMANTS THEIR AGENTS OR ANY LAWFUL
OCCUPIER OF THE QUINTAIN BTR ESTATE

Defendant

CERTIFICATE OF URGENCY

I, Carr Jeremy Luke Stephen, Partner within the firm of Clyde & Co LLP St Botolph Building, 138 Houndsditch, London, EC3A 7AR representing the Claimants ("**the Claimants**") in this action HERBY CERTIFY that this matter requires to be heard without notice to the Defendants:

1. The Claimants and their lawful tenants have suffered and continue to suffer intolerable levels of trespass by the Defendants and seek an urgent injunction to restrain unlawful trespass at their private residential estate against Persons Unknown who are understood to consist predominantly of groups of youths who have been persistently trespassing into the estate and causing damage, inconvenience and harm to the residents and the Claimants staff.
2. The Claimants make this application on a without notice basis on the basis that the Defendants are Persons Unknown and there is a persistent and chronic problem of trespass which is affecting the Claimants and their tenants which is continuing despite all reasonable measures having been put in place and which will continue absent the urgent assistance of the court.

3. These are matters of law of sufficient complexity that require the attention of the High Court.
4. The Defendants have, as is explained in the witness evidence filed in support of this application, committed acts of damage to property and made threats to persons. For the reasons more fully set out in the witness evidence, there is a real and imminent risk that:
 - a. The residential blocks which are within the estate will be the target of future trespasses;
 - b. Such trespasses are anticipated to take place imminently and to continue (for the reasons set out in the witness evidence which accompanies the Claimants' application);
 - c. Such trespassory activity is likely to be similar in nature to that regularly experienced at the estate in the past and on an ongoing basis;
 - d. Any such further trespasses would be likely to cause significant disruption and disturbance to the Claimants' tenants and to its staff, undermine the security of the private estate, cause damage to property, financial loss and reputational damage which is incapable of being compensated for money and give rise to potential health and safety risks. As is explained in the witness evidence accompanying this application and claim, the ongoing cost to the Claimants of the steps necessary to help guard against the acts of trespass by the Defendants are significant.
5. We set out below paragraph 3 of the Practice Direction to Civil Procedure Rule 55.

"3.1 The court may exercise its powers under rules 3.1(2)(a) and (b) to shorten the time periods set out in rules 55.5(2) and (3).

3.2 Particular consideration should be given to the exercise of this power if:

- (1) the defendant, or a person for whom the defendant is responsible, has assaulted or threatened to assault:*
 - (a) the claimant;*
 - (b) a member of the claimant's staff; or*
 - (c) another resident in the locality;*
- (2) there are reasonable grounds for fearing such an assault; or*
- (3) the defendant, or a person for whom the defendant is responsible, has caused serious damage or threatened to cause serious damage to the property or to the home or property of another resident in the locality."*

Given the apprehended risk of future incursions and the chronic nature of the problem which is described in the witness evidence as "unmanageable", and the potential impact that it will continue to have on the residents who reside at the Estate, as well as on the Claimants' business, we respectfully request that this matter is referred to a Judge and that the Court exercise its powers under CPR 3.1 to issue the Court papers and provide a hearing date at the earliest possible opportunity.

STATEMENT OF TRUTH

The Claimants believe that the facts stated in this Certificate of Urgency are true. The Claimants 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 by the Claimants to sign this Statement of Truth on their behalf

Signed.....

Name Carr Jeremy Luke Stephen

Position Partner

Dated 1 July 2025