

**Claim Form  
(CPR Part 8)**

In the High Court of Justice  
Queen's Bench Division

Claim no.

11017X00849

Fee Account

DDA0092146

**RECEIVED**  
**10 MAR 2017**  
**CODV**

Claimant

SEAL

The London Borough of Barking and Dagenham  
Civic Centre, Second Floor  
Wood Lane  
Dagenham  
RM10 7BN



Defendant(s)

Mr Tommy Stokes & 63 Others as per attached list  
Persons Unknown being members of the traveller community who have unlawfully encamped within  
the borough of Barking and Dagenham

Does your claim include any issues under the Human Rights Act 1998?  Yes  No

Details of claim (see also overleaf)

Assigned to Master THURNETT

Defendant's  
name and  
address

As attached

£


Court fee	
Legal representative's costs	
Issue date	10 MAR 2017

Claim no.	
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Details of claim *(continued)*

5. For the reasons set out in the witness statements, it is necessary and expedient for the promotion and protection of the interests of the inhabitants of LBBD and to prevent further apprehended breaches of planning control and to prevent further acts of anti-social behaviour and to seek an injunction to prevent repeated establishment of unauthorised encampments.

6. It is necessary to bring these proceedings against persons unknown and to deter any unauthorised encampments on specified sites by such persons. It is not possible to identify all of the individuals who have formed part of these unauthorised encampments, many of whom are not prepared to identify themselves. The draft Order attached with this claim form recognises that a more limited order should be sought against Persons Unknown. Accordingly, the order sort confines the scope of the injunction against persons unknown to specified sites within the Borough.

Statement of Truth	
*(I believe)-that the facts stated in these particulars of claim are true.	
Full name <u>Fiona Taylor</u>	
<u>Name of claimant's legal representative's firm : London Borough of Barking and Dagenham</u>	
signed <u></u>	position or office held
<u>Director of Law and Governance</u>	(if signing on behalf of firm or company)
	<i>*delete as appropriate</i>

London Borough of Barking and Dagenham  
 Civic Centre Second Floor  
 Wood Lane  
 Dagenham RM10 7BN

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

# List of Defendants

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(2) MR JOHN WARD

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(4) MR PATRICK JOSEPH MCDONAGH

(5) MRS MARGRET STOKES

(6) MS ANNIE LAWRENCE

(7) MR TOM MURPHY

(8) MS MARY CASSIDY

(9) MR DARREN LEE

(10) MS JOAN CONNER

(11) MR ANDREW CASSIDY

(12) MR ROY GOGGINS

(13) MR JIM COLLINS

(14) MR DAVY WARD

(15) MR GILES O'SULLIVAN-WADE

(16) MISS ELIZABETH CONNORS

(17) MR J CASSIDY

(18) MISS MARY DORAN

(19) MR JOHN CONNORS

(20) MISS MARY CONNORS

(21) MR LAWRENCE CONNORS

(22) MR WILLIAM CASSIDY

- (23) MISS ELIZABETH BERRY
- (24) MR JIM COFFEY
- (25) MR PATRICK DORAN
- (26) MR JOHN BRIEN
- (27) MR SAMUEL JASON BARRY
- (28) MR MARTIN MCDONAGH
- (29) MR BEN WORBLER
- (30) MS WINNIFRED LOUISE MCDONAGH
- (31) MR BRIAN LAWRENCE
- (32) MR MARTIN STOKES
- (34) MR PATRICK STOKES
- (35) MR WILLIAM LAWRENCE
- (36) MR SIMON LAWRENCE
- (37) MR PATRICK STOKES
- (38) MR KEVIN MCDONAGH
- (39) MR BRIAN STOKES
- (40) MR PATRICK STOKES
- (41) MR THOMAS STOKES
- (42) MR EDWARD MCDONAGH
- (43) MR AMBROSE LEE
- (44) MR MARTIN MCDONAGH
- (45) MR MARTIN MCDONAGH
- (46) MR JAMES JOHNSON
- (47) [REDACTED]

- (48) MR JAMES MCDONAGH
- (49) MR JOSEPH GEOFFREY DERRETT
- (50) MR MATHEW MCGRORY
- (51) MS MARY WARD
- (52) MS JOSEPHINE WARD
- (53) MS NICOLA WARD
- (54) MS DONNA MARIE WARD
- (55) MS ROSE CONNORS
- ~~MS ROSABRIA WARD~~
- (57) MR EDWARD WARD
- (58) MS MARTINA WARD
- (59) MR CHRISTOPHER WARD
- (60) MR MARTIN WARD
- (61) MS VANESSA WARD
- (62) MS KATHLEEN WARD
- (63) MR JAMES WARD
- (64) MR JOEY WARD
- (65) PERSONS UNKNOWN

IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION

Claim Number: \_\_\_\_\_

IN THE MATTER OF S.222 LOCAL GOVERNMENT ACT 1972  
AND S187B TOWN AND COUNTRY PLANNING ACT 1990  
AND S1 ANTI SOCIAL BEHAVIOUR CRIME AND POLICING ACT 2014

Before \_\_\_\_\_

On \_\_\_\_\_

BETWEEN

THE LONDON BOROUGH OF BARKING AND DAGENHAM

Claimant

-and-

- (1) MR TOMMY STOKES
- (2) MR JOHN WARD
- (3) MS MARY CONNOR
- (4) MR PATRICK JOSEPH MCDONAGH
- (5) MRS MARGRET STOKES
- (6) MS ANNIE LAWRENCE
- (7) MR TOM MURPHY
- (8) MS MARY CASSIDY
- (9) MR DARREN LEE
- (10) MS JOAN CONNER
- (11) MR ANDREW CASSIDY

- (13) MR JIM COLLINS
- (14) MR DAVY WARD
- (15) MR GILES O'SULLIVAN-WADE
- (16) MISS ELIZABETH CONNORS
- (17) MR J CASSIDY
- (30) (18) MISS MARY DORAN
- (19) MR JOHN CONNORS
- (20) MISS MARY CONNORS
- (21) MR LAWRENCE CONNORS
- (22) MR WILLIAM CASSIDY
- (23) MISS ELIZABETH BERRY

(36) MR SIMON LAWRENCE

[REDACTED]

[REDACTED]

(38) MR KEVIN MAEYHANRETT

(39) MR BRIAN STOKES

(40) MR PATRICK STOKES

(41) MR THOMAS STOKES

(42) MR EDWARD MCDONAGH

(43) MR AMBROSE LEE

(44) MR MARTIN MCDONAGH

(45) MR MARTIN MCDONAGH

(46) MR JAMES JOHNSON

(47) MR JAMES WARD

(48) MR JAMES MCDONAGH

(50) MR MATHEW MCGRORY

(51) MS MARY WARD

(52) MS JOSEPHINE WARD

(53) MS NICOLA WARD

(54) MS DONNA MARIE WARD

Defendants

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PROPOSED DRAFT ORDER

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IF YOU, ANY OF THE ABOVE NAMED FIRST TO SIXTY FOURTH DEFENDANTS OR

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF

UPON HEARING COUNSEL FOR THE CLAIMANT AND [ ] FOR THE

**AND UPON READING THE PAPERS AND HEARING THE APPLICATION FOR AN**

Until further order the First to Sixty Fourth Defendants are forbidden from:

1. Setting up an encampment on any land within the London Borough of Barking and Dagenham unless authorised to do so by the owner of the land
2. Setting up an encampment on any land within the London Borough of Barking and Dagenham without written permission from the Local Planning Authority, or, planning permission granted by the planning inspector.
3. Entering and/or occupying any part of the Land for residential purposes (temporary or

waste  
in

Until further order the Sixty Fifth Defendants are forbidden from:

6. Setting up an encampment on any land identified on the attached map and list of sites

9. \_\_\_\_\_ unless an waste  
and the deposit is in  
without written permission from the local planning authority or planning permission

The Land in this order means:

10. For the First to Sixty Fourth Defendants all land within the London Borough of



11. For the Sixty Fifth Defendants (persons unknown) all the land marked on the map at Schedule 1 of this Order and identified by the key to the map and numbered 1 to 140, further details of which are on the list at Schedule 2 of this Order.

12. Service of this Order shall be by affixing a copy of this Order in a transparent envelope, or laminated copy, in a prominent position on the land.

\_\_\_\_\_ apply to the Court  
\_\_\_\_\_ Claimant to vary or discharge this

14. The Defendant pay the Claimant's costs to be assessed at £ \_\_\_\_\_

## GUIDANCE NOTES

### EFFECT OF THIS ORDER

15. A Defendant who is an individual who is ordered not to do something must not do it ~~himself or in any other way. He must not do it through others acting on his behalf or~~

16. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

### PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

#### EFFECT OF THIS ORDER

17. It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

#### INTERPRETATION OF THIS ORDER

18. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.

19. A requirement to serve on "the Defendants" means on each of them, unless an Order of the Court specifies otherwise. The Order is, however, effective against any Defendant on whom it is served.

20. An Order requiring the Defendants to do or not to do anything applies to all Defendants.

21. "controlled waste" has the same meaning as within s.75(4) of the Environmental Protection Act 1990

#### COMMUNICATIONS WITH THE COURT

22. All communication to the Court about this order should be sent to Room [\_\_\_\_\_] Royal Courts of Justice, Strand, London, WC2A 2LL (020 7947 6010).

IN THE HIGH COURT OF JUSTICE

CLAIM NO:

QUEENS BENCH DIVISION

~~THE LONDON BOROUGH OF BARKING AND DAGENHAM (CLAIMANT) v~~

~~THE LONDON BOROUGH OF BARKING AND DAGENHAM (CLAIMANT) v~~  
AND POLICING ACT 2014

BETWEEN:

LONDON BOROUGH OF BARKING AND DAGENHAM

Claimant

-and-

(1) ~~MR TOMMY STOKES & 63 OTHER DEFENDANTS (IN THE~~  
ATTACHED SCHEDULE 1)

(2) PERSONS UNKNOWN BEING MEMBERS OF THE TRAVELLER

Defendants

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SCHEDULE 1

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- Key**
- Car Park
  - Leisure Facility & Heritage
  - Library & Community Facility
  - Office/Depot

27/1

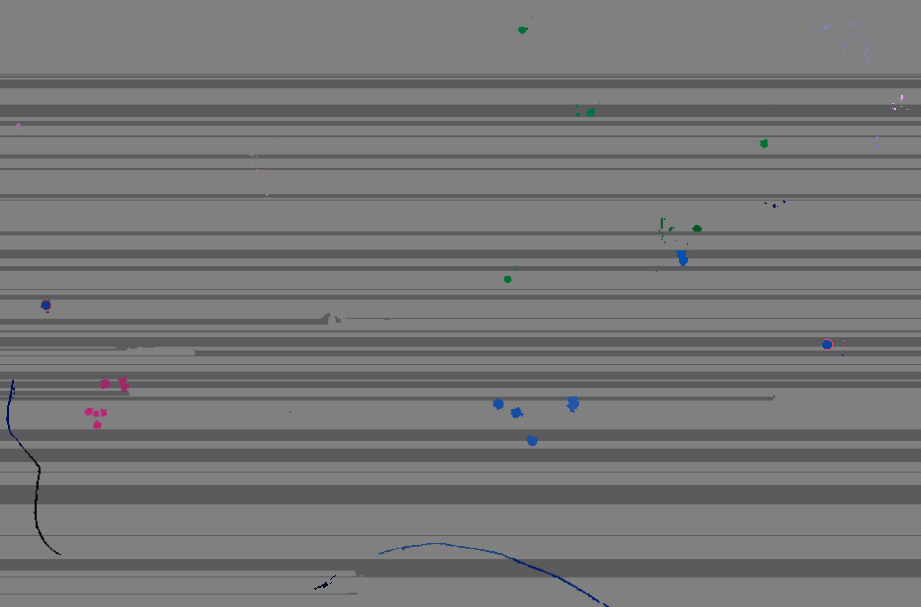
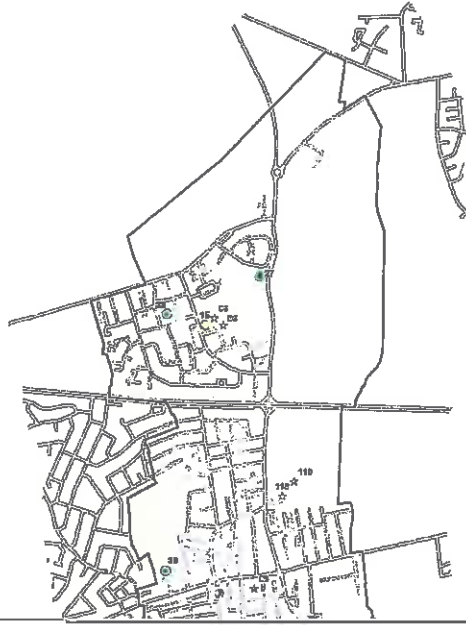


Key

- Car Park
- ⊙ Leisure Facility & Heritage
- ⊙ Library & Community Facility
- ⊙ Office/Dept
- ⊙ Office/Export/Warehouse
- ⊙ Park, Allotment, Cemetery & Green Space
- Private Site
- Public Open Space

School Types:

- ★ All
- ★ College
- ★ Infant
- ★ Junior
- ★ Primary
- ★ Secondary
- ★ Special



IN THE HIGH COURT OF JUSTICE

CLAIM NO:

QUEENS BENCH DIVISION

IN THE MATTER OF S222 LOCAL GOVERNMENT ACT 1972, 187B TOWN AND  
COUNTRY PLANNING ACT 1990, AND S1 ANTI-SOCIAL BEHAVIOUR, CRIME  
AND POLICING ACT 2014

BETWEEN:

LONDON BOROUGH OF BARKING AND DAGENHAM

Claimant

-and-

(1) MR TOMMY STOKES & 63 OTHER DEFENDANTS (IN THE  
ATTACHED SCHEDULE 1)

(2) PERSONS UNKNOWN BEING MEMBERS OF THE TRAVELLER  
COMMUNITY WHO HAVE UNLAWFULLY ENCAMPED WITHIN THE  
BOROUGH OF BARKING AND DAGENHAM

Defendants

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SCHEDULE 2

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