IN THE HIGH COURT	OF JUSTICE	<u>Claim N</u>	lo.	
KING'S BENCH DIVISION DIVISION				
BEFORE THE HONO	URABLE [JUDGE]			
[DATE]				
BETWEEN: (1)		UP PROPERTIES LI RATIONS LIMITED	MITED	
			<u>Claimants</u>	
- and -				
PERSONS UNKNOWN WHO WITHOUT THE CONSENT OF THE CLAIMANTS ENTER OR REMAIN ON THE PREMISES KNOWN AS TINTAGEL HOUSE, 92 ALBERT EMBANKMENT, LONDON SE1 7TY				
			<u>Defendant</u>	
	INJUNCTI	ON ORDER		

PENAL NOTICE

IF YOU THE WITHIN THE PERSONS UNKNOWN OR ANY OF YOU DISOBEY
THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS
ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE
IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

<u>IMPORTANT NOTICE TO THE PERSONS UNKNOWN</u>

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimant's claim by Part 8 Clair	n Form (the " Claim "), dated [],
and its application for an injunction, dated	[the "Application").

AND UPON the Claimant's application for an order for alternative service pursuant to CPR r. 6.15 and r. 6.27 dated 29 May 2025.

AND UPON hearing Counsel for the Claimant and [] for the Defendant.

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order.

AND UPON paragraphs 3 and 6 - 8 of this Order being pursuant to the guidance in *Wolverhampton City Council v London Gypsies & Travellers* [2023] UKSC 47.

IT IS ORDERED THAT:

<u>INJUNCTION</u>

- 1. Until 23:00 on 31 January 2026 [or such other date as the Court thinks fit] or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not:
 - a. enter, occupy or remain upon all or any part of the commercial premises known as Tintagel House, 92 Albert Embankment, London SE1 7TY (the "Premises") which is shown for identification purposes edged red on the attached plan at Schedule 1 for the purposes of protest.
 - b. erect or place any structure (including, for example, tents, gazebos or other sleeping equipment) on the Premises.
- 2. In respect of paragraphs 1(a)-(b), the Defendants must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

VARIATION

- 3. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
- 4. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
- 5. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

- 6. The following steps are to be taken as having been good and sufficient notification to the Persons Unknown:
 - a. Uploading a copy of the Claim, the Application, draft order and supporting witness statements and exhibits onto the following website:
 - i. <u>www.tintagelhouseinjunction.com</u>
 - b. Emailing the following email addresses stating that a claim has been made and that the claim documents can be found at the websites referred to above:
 - i. hi@transkidsdeservebetter.org
 - ii. press@transkidsdeservebetter.org
 - c. Affixing notices in prominent positions at the Premises setting out where any such documents can be found at the websites referred to above and how they can be obtained in hard copy.
- 7. This Order shall be notified to the Persons Unknown by the Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website:
 - i. www.tintagelhouseinjunction.com
- b. Sending a copy of the Order to:
 - i. hi@transkidsdeservebetter.org
 - ii. press@transkidsdeservebetter.org
- c. Affixing a warning notice of A3 size in a prominent position on the main door to the building at the Premises and in a prominent location outside the Building at the Premises, these locations being shown on the plan at Schedule 1 marked with a 'X'.
- 8. Notification to Persons Unknown of any applications in these proceedings shall be effected by the Claimants carrying out each of the following steps:
 - a. Uploading a copy of the Order onto the following website:
 - i. www.tintagelhouseinjunction.com
 - b. Sending a copy of the Order to:
 - i. hi@transkidsdeservebetter.org
 - ii. press@transkidsdeservebetter.org
 - c. Affixing a notice in A4 size on the main door to the building at the Premises and in a prominent location outside the building at the Premises stating that the application has been made and where it can be accessed in hard copy and online.
- 9. Notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 8(a)-(b) only.
- 10. In respect of paragraphs 6-9 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
- 11. For the avoidance of doubt, in respect of the steps referred to at paragraphs 6(c), 7(c) and 8(c), effective notification will be deemed to have taken place when

those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

- 12. Liberty to apply.
- 13. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

14. The Claimants' solicitors and their contact details are:

Mishcon de Reya LLP Africa House 70 Kingsway London WC2B 6AH

Tel: 020 3321 7000

Email: Ben.Tasker@Mishcon.com

Ref: CYK/ICEL/BT/82100.1

Dated:

SERVICE OF THIS ORDER

The Court has provided a sealed copy of this Order to the Claimants by its solicitors and their contact details are:

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Mishcon de Reya LLP Africa House 70 Kingsway London WC2B 6AH

Tel: <u>020 3321 7000</u>

Email: Ben.Tasker@Mishcon.com

Ref:

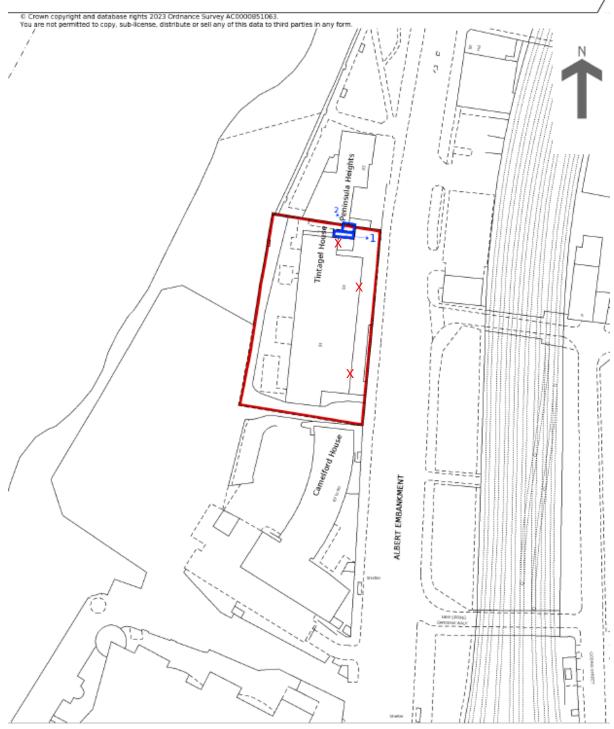
A copy of the sealed Order will be sent by the Claimants to the Defendant in accordance with the terms of the Order above.

SCHEDULE 1 - PLAN

HM Land Registry Official copy of title plan

Title number TGL588640
Ordnance Survey map reference TQ3078SW
Scale 1:1250 enlarged from 1:2500
Administrative area Lambeth





SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANT

The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunctions in paragraphs 1-2 of this Order have caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.