

Application notice

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Name of court HIGH COURT, KING'S BENCH DIVISION	Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)
	H W F - [] [] [] - [] [] []
Warrant no. (if applicable)	
Claimant's name (including ref.) THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA and WESTMINSTER CITY COUNCIL	
Defendant's name (including ref.) Persons Unknown (in three categories as described in the Claim Form)	
Date	13.4.26 23 Apr 2026

1. What is your name or, if you are a legal representative, the name of your firm?

Bi-Borough Legal Services

KB-2026-001615

2. Are you a Claimant Defendant Legal Representative
 Other (please specify) []

If you are a legal representative whom do you represent?

THE CLAIMANTS

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

An order for interim relief pursuant to CPR 25.1(a) restraining the Defendants from: (1) Participating in 'Car Cruising', as defined in the draft order, as a driver or passenger; (2) Participating in a gathering in the expectation that there will be Car Cruising; and (3) Promoting, organising or publicising Car Cruising.

4. Have you attached a draft of the order you are applying for? Yes No
5. How do you want to have this application dealt with? at a hearing without a hearing
 at a remote hearing
6. How long do you think the hearing will last? Hours Minutes
Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period

Not applicable

8. What level of Judge does your hearing need?

High Court Judge or Deputy

9. Who should be served with this application?

the Defendant

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

Service will be attempted in the manner set out in the draft order; and an alternative service order will be sought at the first hearing;

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

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

If necessary, please continue on a separate sheet.

The Claimant seeks the following relief:

- (i) An Injunction order;
- (ii) A power of arrest;
- (iii) Declaratory relief; and
- (iv) Further or other relief as the Court thinks fit; and
- (v) Costs against any of the Defendants that may be identified.

To restrain the Defendants from:

1. Participating in the activities set out in Schedule 2 to this Order ('the Prohibited Activities', any one of which are referred to as 'a Prohibited Activity') between the hours of 6 pm and 6 am in a gathering of 2 or more persons within the Claimant's local government area (known as "Kensington and Chelsea"), the boundaries of which are delineated in red on a map attached to this Order at Schedule 1;
2. Participating in a gathering of 2 or more persons between the hours of 3 pm and 7 am within Kensington and Chelsea with the intention or expectation that some of those present will engage in a Prohibited Activity; and
3. Promoting, organising or publicising by any means and manner whatsoever a Prohibited Activity in a gathering of 2 or more persons with the intention or expectation that some of those present in the gathering that is promoted, organised or publicised will engage in a Prohibited Activity within Kensington and Chelsea (as delineated at Schedule 1 to this Order);

'Prohibited activities' being 'Car Cruising' activities as defined in the draft order filed with this application; Full details of the legal and factual basis for the claim are set out in the attached Details of Claim and witness statements filed herewith.

This written evidence is served with this application within a hearing bundle consisting of:

- The Draft Part 8 Claim Form (the signed claim form will be filed in addition);
- The Draft Details of Claim, to be annexed to the above;
- This Application Notice (in draft);
- The Draft Order;
- The skeleton argument in support of the interim injunction; and
- Witness statements and exhibits in support of the application.

The Claimant seeks orders for service of the Claim Form and supporting documentation by alternative means pursuant to CPR 6.15 & 6.27 & 6.28. The proposed steps to effect service are set out in the draft Order.

The Claimant also seeks an order dispensing with personal service of the Injunction pursuant to CPR81.4 (2)(d). The proposed steps to bring the order to the attention of persons likely to be affected by any Injunction are set out in the draft Order.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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 **believe** that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature

Anghel Pufulete

- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

1 3

Month

0 4

Year

2 0 2 6

Full name

Anghel Pufulete

Name of applicant's legal representative's firm

Bi-Borough Legal Services

If signing on behalf of firm or company give position or office held

Senior Solicitor

Applicant's address to which documents should be sent.

Building and street

Bi-Borough Legal Services

Second line of address

The Town Hall, Hornton Street

Town or city

London

County (optional)

Postcode

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If applicable

Phone number

07966176891

Fax phone number

DX number

Your Ref.

LS/AP

Email

apufule@westminster.gov.uk