Claim No:

IN THE HIGH COURT OF JUSTICE

LEEDS DISTRICT REGISTRY

KING'S BENCH DIVISION

BEFORE:

DATE:

PURE GYM LIMITED

Claimant

and

PERSONS UNKNOWN SEEKING TO ENTER OR REMAIN ON THE CARPARKS OF THE CLAIMANT'S GYMS WITH CARAVANS, MOBILE HOMES OR TRAILER TENTS AT ITS GYM SITES IDENTIFIED ON THE PLANS ATTACHED TO THIS ORDER

Defendant

[DRAFT] ORDER FOR AN INJUNCTION

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR 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.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

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 Claim Form, dated 3 July 2026 , and its application for an injunction, dated 3 July 2026 (the "**Application**").

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

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.

AND UPON the following terms having the following meanings in this Order:

"the Injunction Sites" being all or any part of the sites referred to in the Particulars of Claim in respect of which the Claimant seeks injunctive relief, as listed in **Schedule 3** hereto and as shown for identification purposes edged red on the attached plans at **Schedule 1** marked as follows:

(1) Plan 1: the Denton plan
(2) Plan 2: the Stockport North plan
(3) Plan 3: the Stockport South plan
(4) Plan 4: the Moston plan
(5) Plan 5: the Debdale plan
(6) Plan 6: the Knaresborough plan
(7) Plan 7: the Sheffield South plan
(8) Plan 8: the York plan
(9) Plan 9: the Hazel Grove plan
(10) Plan 10: the Mansfield plan
(11) Plan 11: the Hyde Plan
(12) Plan 12: the Sheffield Crystal Peaks plan

IT IS ORDERED THAT:

INJUNCTION

1. Until 23:00 on [ ] or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not enter, occupy or remain

upon the Injunction Sites as identified on the plans attached at schedule 1 hereto with vehicles, mobile homes, horses, caravans or other wheeled trailers.

2. In respect of paragraph 1 above, 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 Claimants' 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 Claimants' 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. This Order shall be notified to Persons Unknown by the Claimant carrying out each of the following steps:

    a. Affixing the papers in a prominent position at the entrance to the car park of each site within the Injunction Sites and inside the gyms of each of the Claimant's sites identified at schedule 3 hereto;

    b. Including a 'QR' code (otherwise known as a 3D barcode) and URL link on the cover sheet to be displayed with the papers affixed as per paragraph (a) above, and;

    c. Displaying on the cover sheet to be displayed with the papers affixed as per paragraph (a) an URL link to the injunction papers on the home webpage of the Claimant's website.

7. Notification to the Defendants of any further applications or papers shall be affected by carrying out the steps identified at paragraph 6(a) – (c) above.

8. In respect of paragraphs 6 - 7 above, in accordance with CPR 6.15(4), 6.27 and 81.4 (2) (c) and (d), effective service / notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.

9. For the avoidance of doubt, in respect of the step referred to at paragraph 6(a), effective service / notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

10. The Court is satisfied that the Claimant has taken the steps as set out above at paragraphs 6(a) – (c) prior to the first hearing in sufficient time and that the Defendants are therefore deemed notified or served of the hearing of this matter on [date].

FURTHER DIRECTIONS

11. Any contempt application against any Person Unknown may only be brought with the permission of the Court.

12. Liberty to apply.

13. Costs are reserved.

INTERPRETATION OF THIS ORDER

In this Order the words "he" "him" or "his" include "she" or "her" and "it" or "its".

Where there are two or more Defendants then (unless the contrary appears) references to "the Defendant" mean both or all of them;

An Order requiring "the Defendant" to do or not to do anything requires each Defendant to do or not to do it;

A requirement relating to service of this Order or of any legal proceedings on "the Defendant" means on each of them.

COMMUNICATIONS WITH THE CLAIMANT

NAME AND ADDRESS OF CLAIMANT'S SOLICITORS FOR CONTACT

The Claimant's solicitors are:-

Browne Jacobson LLP

15th Floor

103 Colmore Row

Birmingham

B3 3AG

Ref: JCOL02.044404.00302

Dated:

SERVICE OF THIS ORDER

The Court has provided a sealed copy of this Order to the serving party, the Claimant's solicitors:

Browne Jacobson LLP

15th Floor

103 Colmore Row

Birmingham

B3 3AG

Ref: JCOL02.044404.00302

James.Coles@brownejacobson.com

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

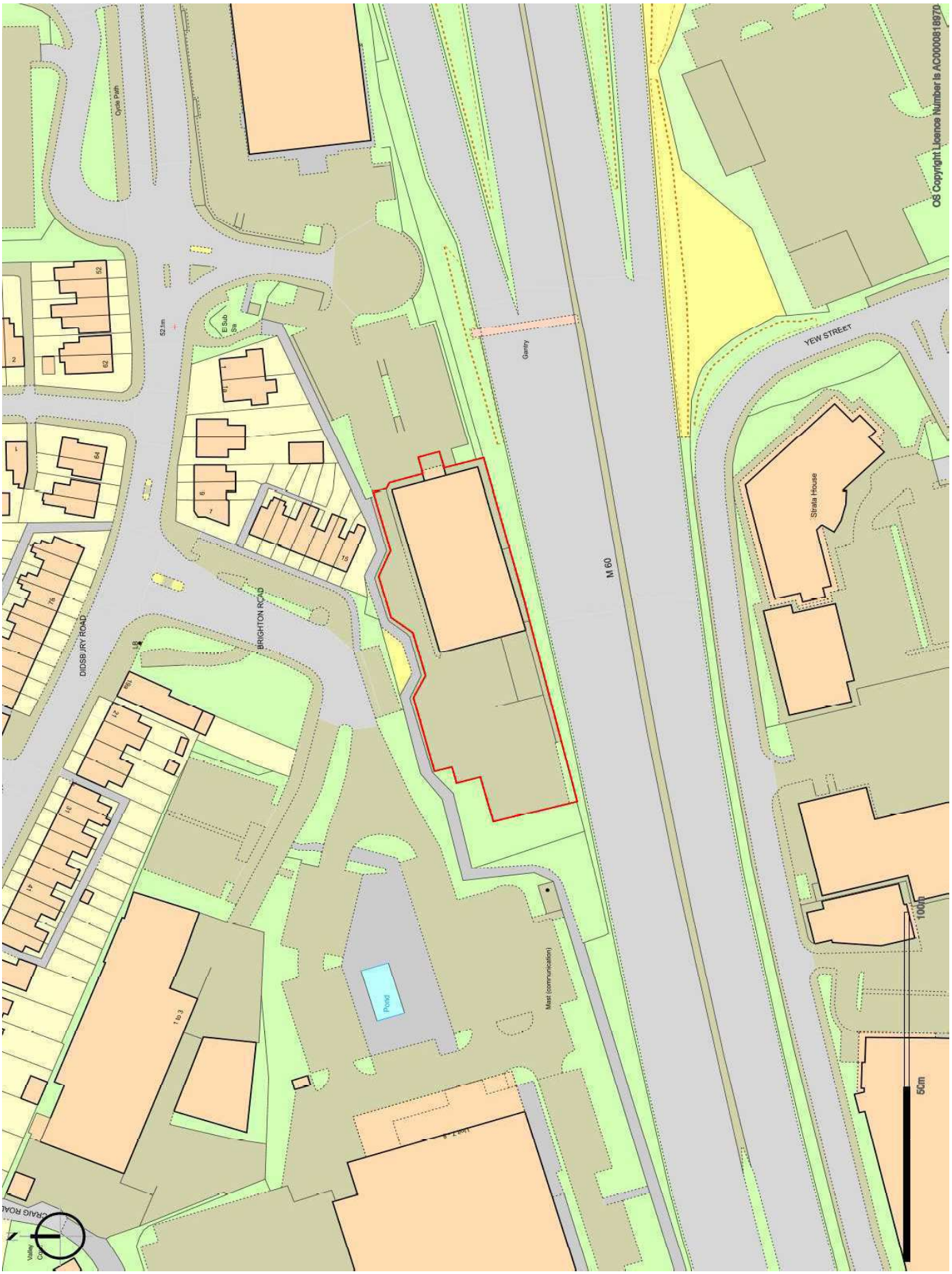
SCHEDULE 1.

Injunction Sites Plans 1 – 12.

Plan 1: the Denton plan



Plan 2: the Stockport North plan



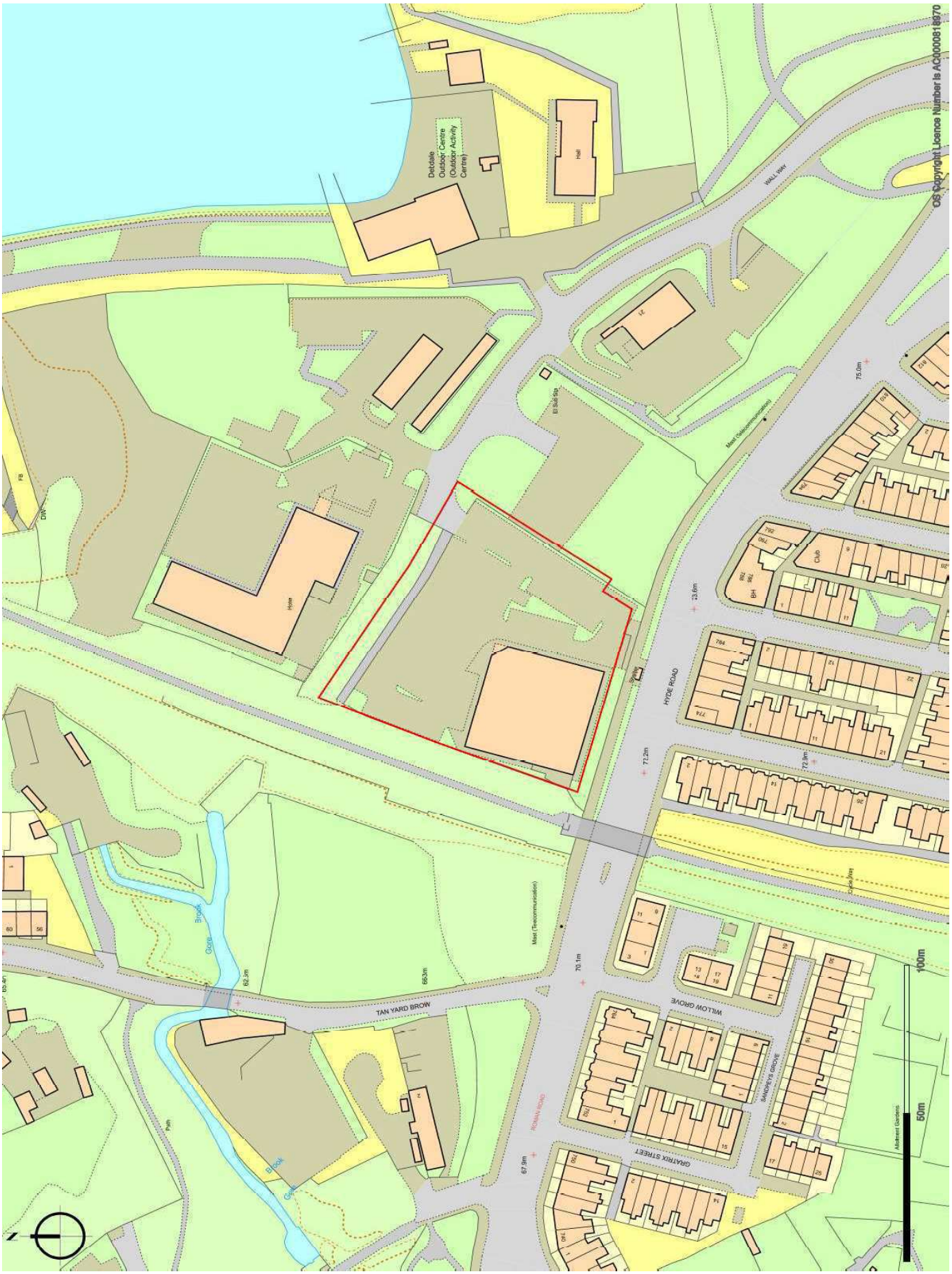
Plan 3: the Stockport South plan



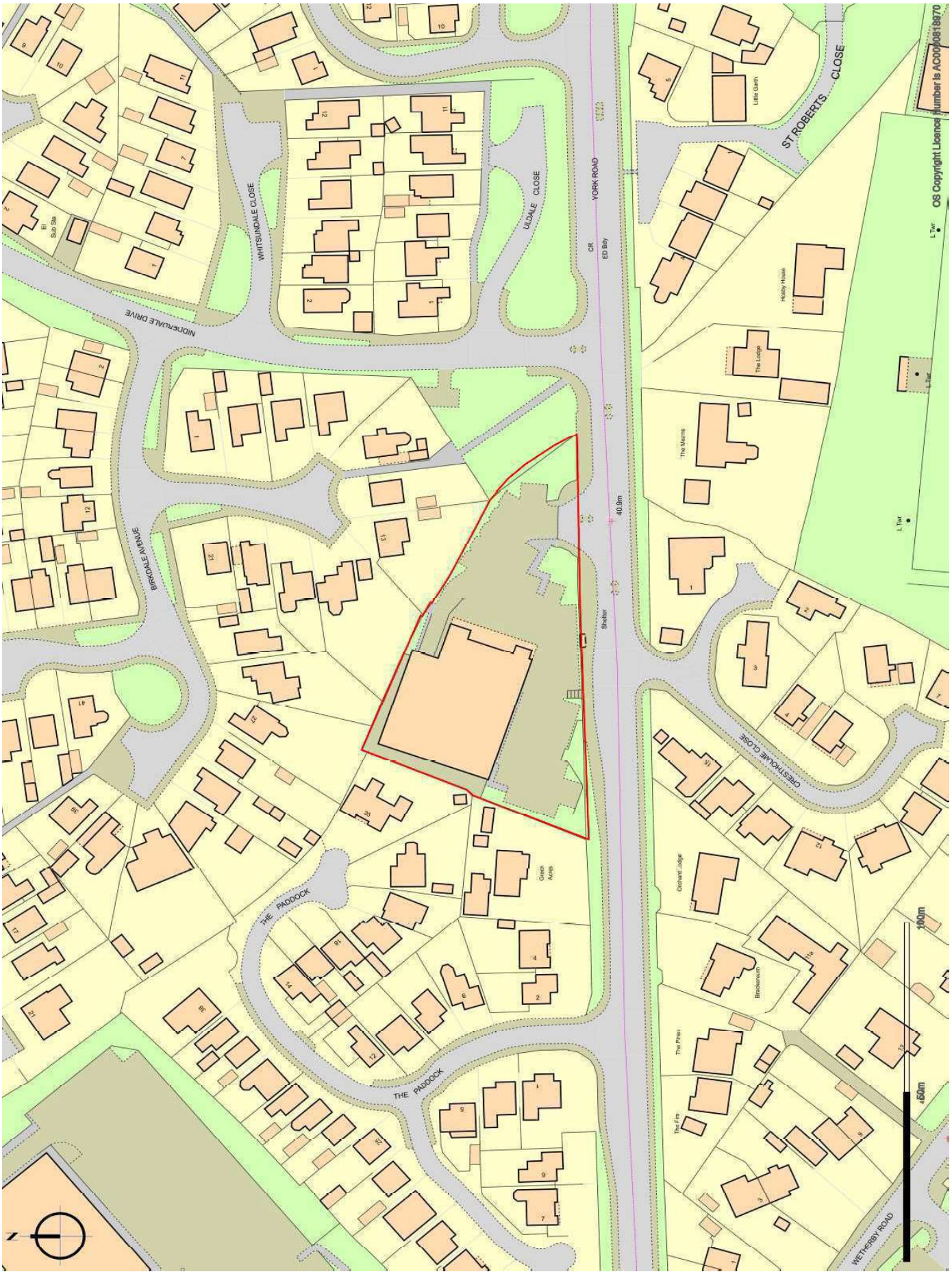
Plan 4: the Moston plan



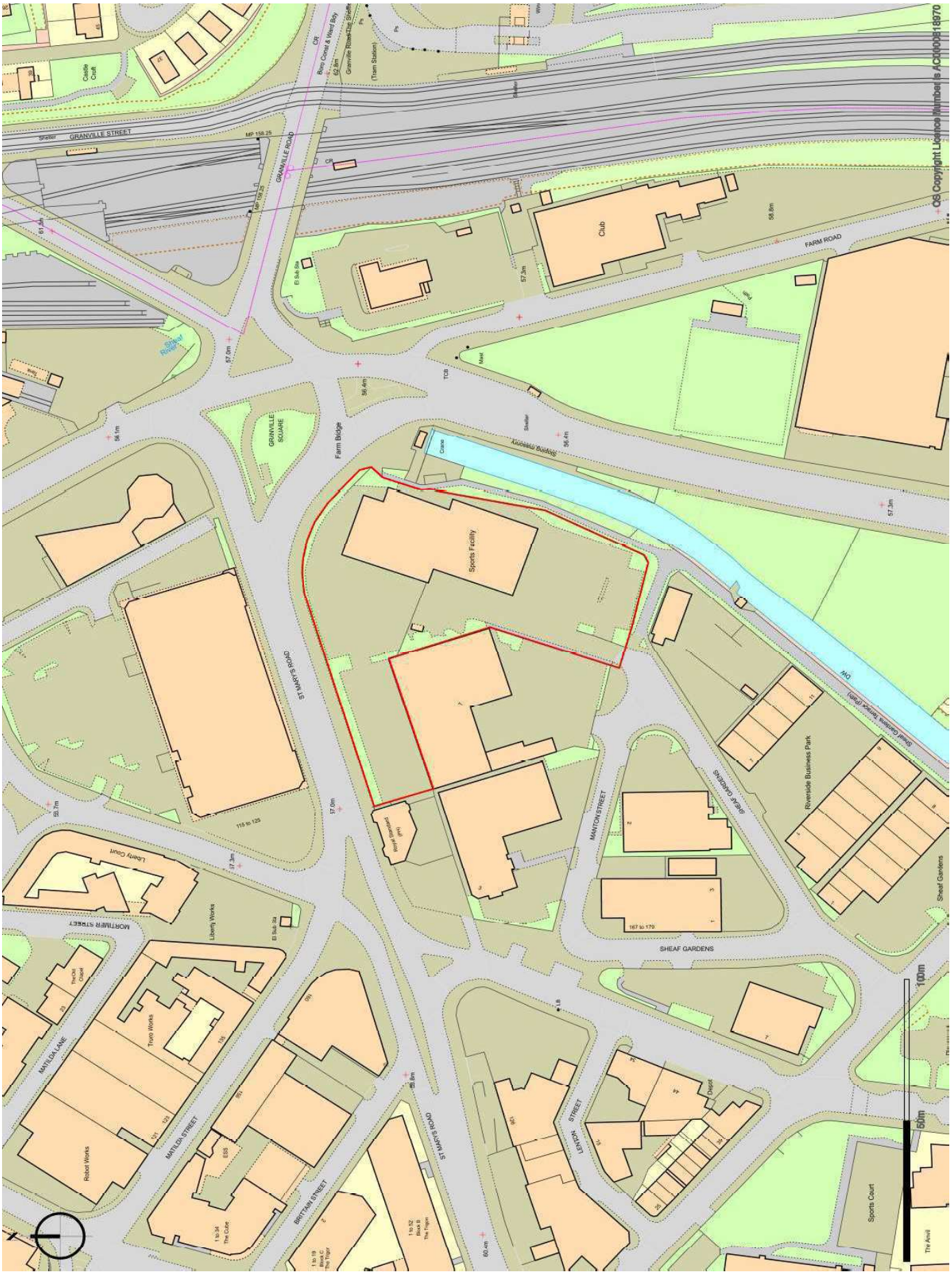
Plan 5: the Debdale plan



Plan 6: the Knaresborough plan



Plan 7: the Sheffield South plan



Plan 8: the York plan



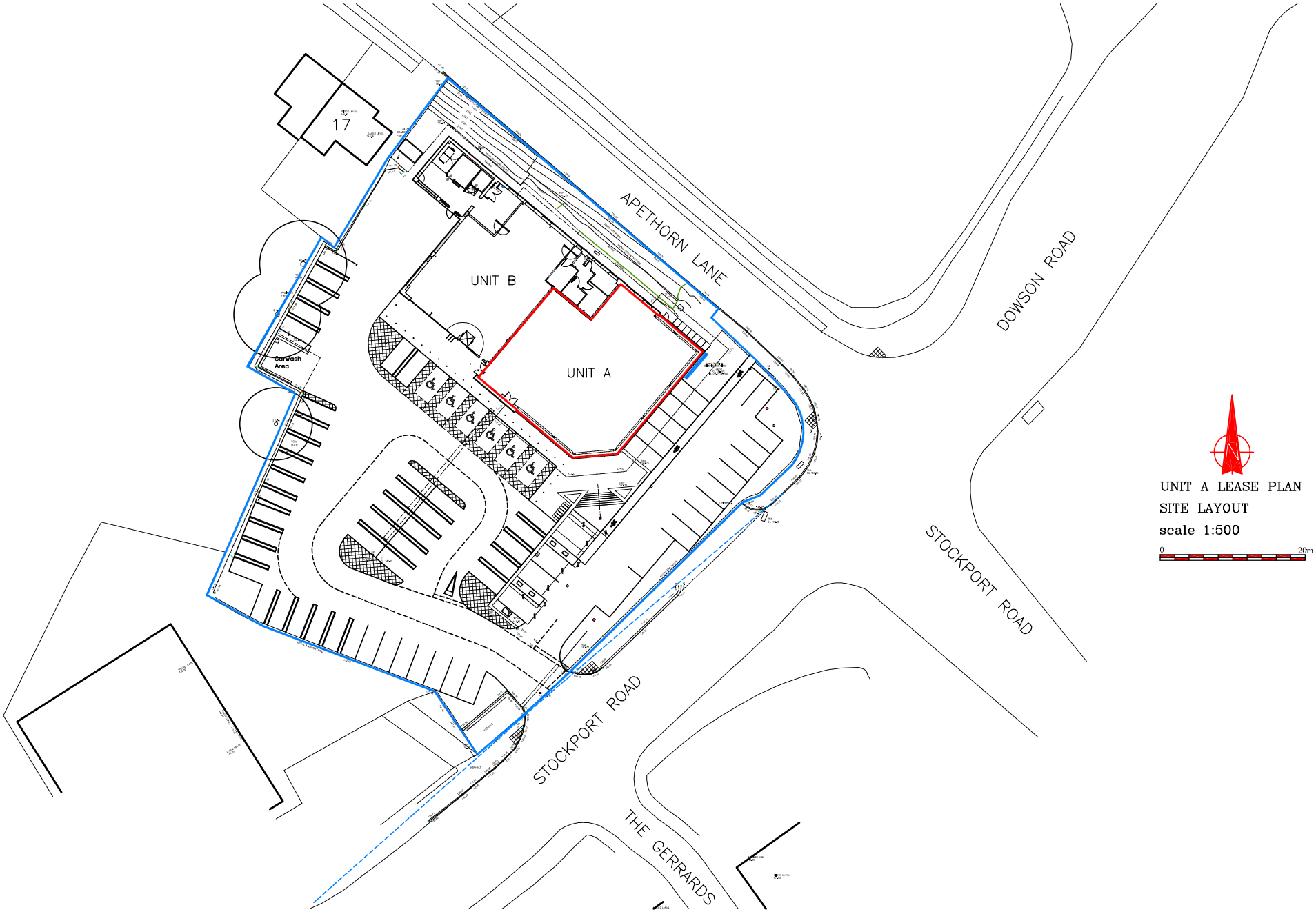
Plan 9: the Hazel Grove plan



Plan 10: the Mansfield plan



Docusign Envelope ID: CFFD10C3-197D-404D-AED6-5699F9C2D0E8



Plan 11: the Hyde plan

Ward Architecture Limited
Re-plan, Re-design, Re-generate

PRELIMINARY LAYOUT

All setting out dimensions to be site confirmed prior to works commencing and any discrepancies confirmed to architect. This drawing is to be read in conjunction with all other architectural and structural engineers drawings.
Any queries please email info@wardarchitectureltd.co.uk

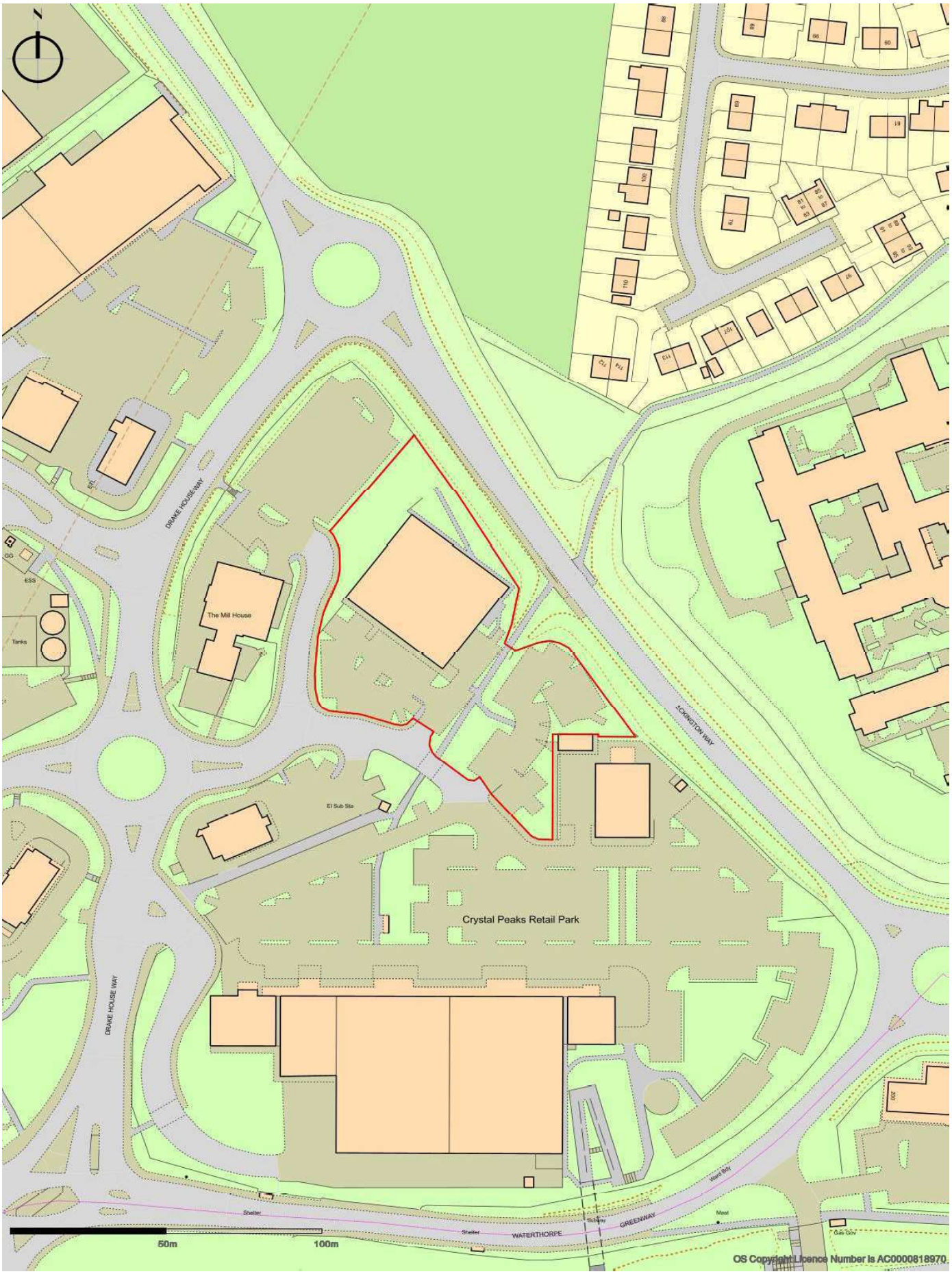
INCHAPE AUDI APPROVED CENTRE
60 STOCKPORT ROAD, HYDE
for DRANSFIELD PROPERTIES LIMITED

UNIT A LEASE PLAN SITE LAYOUT 1:500@A3

Date: 03/03/26

Job Number: **WAL-23-42-LP04C**

Plan 12: the Sheffield Crystal Peaks plan



SCHEDULE 2.

Undertakings given to the Court 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.

SCHEDULE 3

List of the Injunction Sites which are affected by this order

1. PureGym Denton, Oldham Street, Denton, M34 3SJ and the associated car park

2. PureGym Stockport North, Unit 2 Kings View, Didsbury Road, SK4 2BD and the associated car park

3. PureGym Stockport South, Victoria Works, Hempshaw Lane, SK1 4LG and the associated car park

4. PureGym Moston, Victoria Avenue East, Moston, M9 7GH and the associated car park

5. PureGym Debdale, Manchester Debdale Walk, Wall Way, M18 7WY and the associated car park

6. PureGym Knaresborough, York Road, Knaresborough, HG5 0SP and the associated car park

7. PureGym Sheffield South, 9-15 Manton Street, Sheaf Gardens, S2 4BA and the associated car park

8. PureGym York, Stirling Rd, York, YO30 4TU (also known as Unit 2, Phase IV, Clifton Moor, York) and the associated car park

9. Puregym Hazel Grove, Commercial Rd, Hazel Grove, Stockport SK7 4BE and the associated car park

10. PureGym Mansfield, Mansfield Leisure Park, Nottingham Rd, Mansfield, NG18 1BW and the associated car park

11. PureGym Hyde, 60 Stockport Road, Gee Cross, SK14 5ET and the associated car park

12. PureGym Sheffield Crystal Peaks, Crystal Peaks Shopping Mall and Retail Park, Drake House Way, Sheffield, S20 7JJ and the associated car park