N244

Application notice

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Name of court	**Claim no.**
High Court of Justice, Leeds District Registry, King's Bench Division	KB-2026-LDS-000089
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
PBA0086886	H W F – LEEDS
Warrant no. (if applicable)	

HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION 06 Jul 2026

Claimant's name (including ref.)
Pure Gym Limited
Town Centre House, Merrion Centre, Leeds, LS2 8LY

(ref.: JCOL02.044404.00302)

Defendant's name (including ref.)
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

Date 03 July 2026

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

Browne Jacobson LLP

2. Are you a ☐ Claimant ☐ Defendant ☑ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent? Claimant

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

(1) An injunction to restrain the Defendants from carrying out tortious acts as set out in the draft Order Particulars of Claim and witness Statement submitted on behalf of the Claimant because the Claimant considers that, in the absence of an injunction being granted, there is a real and imminent risk of trespass on the Claimant's land and interference with private rights of access to the Claimant's land which are the subject of this application.
(2) An order for service of the Claim Form, the Particulars of Claim, the Application Notice, evidence in support, the Order and any other documents in these proceedings by alternative means pursuant to CPR 6.15, 6.27, CPR 81.4(2)(c) and (d).

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? 2 Hours 30 Minutes

Is this time estimate agreed by all parties? ☐ Yes ☑ No

7. Give details of any fixed trial date or period: N/A

8. What level of Judge does your hearing need? High Court Judge / s9 Judge

9. Who should be served with this application? Defendant (Solicitor service only)

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

The premises identified at Schedule 1 and Schedule 3 of the draft Order filed with this Application

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

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

If necessary, please continue on a separate sheet.

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

R. A. Townsend

☐ 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	Month	Year
03	07	2026

Full name

Reece Adams Townsend

Name of applicant's legal representative's firm

Browne Jacobson LLP

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

Solicitor

Applicant’s address to which documents should be sent.

Building and street

15th Floor

Second line of address

103 Colmore Row

Town or city

Birmingham

County (optional)

Postcode

B 3 3 A G

If applicable

Phone number

0370 270 6000

Fax phone number

DX number

727740 Birmingham 62

Your Ref.

JCOL02.044404.00302

Email