

N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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Name of court High Court of Justice, Kings Bench Division.		Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
PBA 0087138	H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) Chancellor, Masters and Scholars of the University of Cambridge CSMAW/0001200-1698		
Defendant's name (including ref.) Persons unknown who, in connection with Cambridge for Palestine or otherwise for a purpose connected with the Palestine-Israel conflict, without the claimant's consent (i) enter occupy or remain upon (ii) block, prevent, slow down, obstruct or otherwise interfere with access to (iii) erect any structure (including tents) on, the following sites (as shown for identification edged red on the attached plans 1 and 2): (A) Greenwich House, Madingley rise, Cambridge, CB3 0TX (B) Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA (C) The Old Schools, Trinity Lane, Cambridge, CB2 1TN		
Date	12 February 2025	

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

Mills & Reeve LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

Claimants - Mills & Reeve LLP

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

An order in the terms of the attached draft order because the Defendants have previously trespassed on parts of or all the Land (as defined in the Order) and there is a substantial, real and imminent risk that those Defendants will trespass upon parts of or all of the Land.

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

The Claimant requests that this application be listed to be heard week commencing 24 February 2025.

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Defendants

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

See paragraph 10 of the draft order for details on the means of service

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.

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



- 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
12	02	2025

Full name

Samuel Maw

Name of applicant's legal representative's firm

Mills & Reeve LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

Botanic House

Second line of address

100 Hills Road

Town or city

Cambridge

County (optional)

Cambridgeshire

Postcode

C B 2 1 P H

If applicable

Phone number

Fax phone number

DX number

Your Ref.

CSMAW/00012000-1698

Email

Samuel.Maw@Mills-Reeve.com

IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO:

BETWEEN:-

CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE

Claimant

- v -

PERSONS UNKNOWN WHO, IN CONNECTION WITH CAMBRIDGE FOR
PALESTINE OR OTHERWISE FOR A PURPOSE CONNECTED WITH THE
PALESTINE-ISRAEL CONFLICT, WITHOUT THE CLAIMANT'S CONSENT (I)
ENTER OCCUPY OR REMAIN UPON (II) BLOCK, PREVENT, SLOW DOWN,
OBSTRUCT OR OTHERWISE INTERFERE WITH ACCESS TO (III) ERECT
ANY STRUCTURE (INCLUDING TENTS) ON, THE FOLLOWING SITES (AS
SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLANS 1

AND 2):

- (A) GREENWICH HOUSE, MADINGLEY RISE, CAMBRIDGE, CB3 0TX
- (B) SENATE HOUSE AND SENATE HOUSE YARD, TRINITY STREET,
CAMBRIDGE, CB2 1TA
- (C) THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN

Defendants

draft ORDER

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 [], and its application for an interim injunction, dated [].

AND UPON hearing the Claimant's application for an interim injunction, dated [], and supporting evidence

AND UPON hearing Counsel for the Claimant

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

AND UPON the "Land" being defined as those sites known as: (a) Greenwich House, Madingley Rise, Cambridge, CB3 0TX; (b) Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA; and, (c) the Old Schools, Trinity Lane, Cambridge, CB2 1TN, as shown for identification edged red on the attached Plans 1 and 2 in Schedule 1

AND UPON "Persons Unknown" being defined as persons unknown who, in connection with Cambridge for Palestine or otherwise for a purpose connected with the Palestine-Israel conflict, without the Claimant's consent (i) enter occupy or remain upon (ii) block, prevent, slow down, obstruct or otherwise interfere with access to (iii) erect any structure (including tents) on, the Land

AND UPON "Defendants" being defined so as to include "Persons Unknown"

IT IS ORDERED THAT:

INJUNCTION

1. Until 12 February 2030 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the Land.
2. Until 12 February 2030 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land.
3. Until 12 February 2030 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.
4. In respect of paragraphs 1-3, 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.
5. The injunctions contained at paragraphs 1-3 shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimant is permitted to file any evidence in support 14 days before the review hearing.

VARIATION

6. 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.

7. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
8. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

9. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR r.6.16, r.6.28 and r.81.4(2)(c).
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice and evidence in support will be notified to Persons Unknown by the Claimant carrying out each of the following steps:
 - a. Uploading a copy onto the following website: www.cam.ac.uk/notices.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an “x” on Plans 1 and 2 setting out where these documents can be found and obtained in hard copy.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimant carrying out each of the following steps:
 - a. Uploading a copy of the Order onto the following website: www.cam.ac.uk/notices.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.

- c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an “x” on Plans 1 and 2.
 - d. Affixing warning notices of A4 size at those locations marked with an “x” on Plan 1 and affixing a warning notice of A3 size at the location marked with an “x” on Plan 2.
12. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimant carrying out each of the following steps:
 - a. Uploading a copy of the application onto the following website: www.cam.ac.uk/notices.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an “x” on Plans 1 and 2 stating that the application has been made and where it can be accessed in hard copy and online.
13. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 12(a)-(b) only.
14. In respect of paragraphs 10 to 13 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
15. For the avoidance of doubt, in respect of the steps referred to at paragraphs 10(c), 11(c)-(d) and 12(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

16. Liberty to apply.

17. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

18. The Claimant's solicitors and their contact details are:

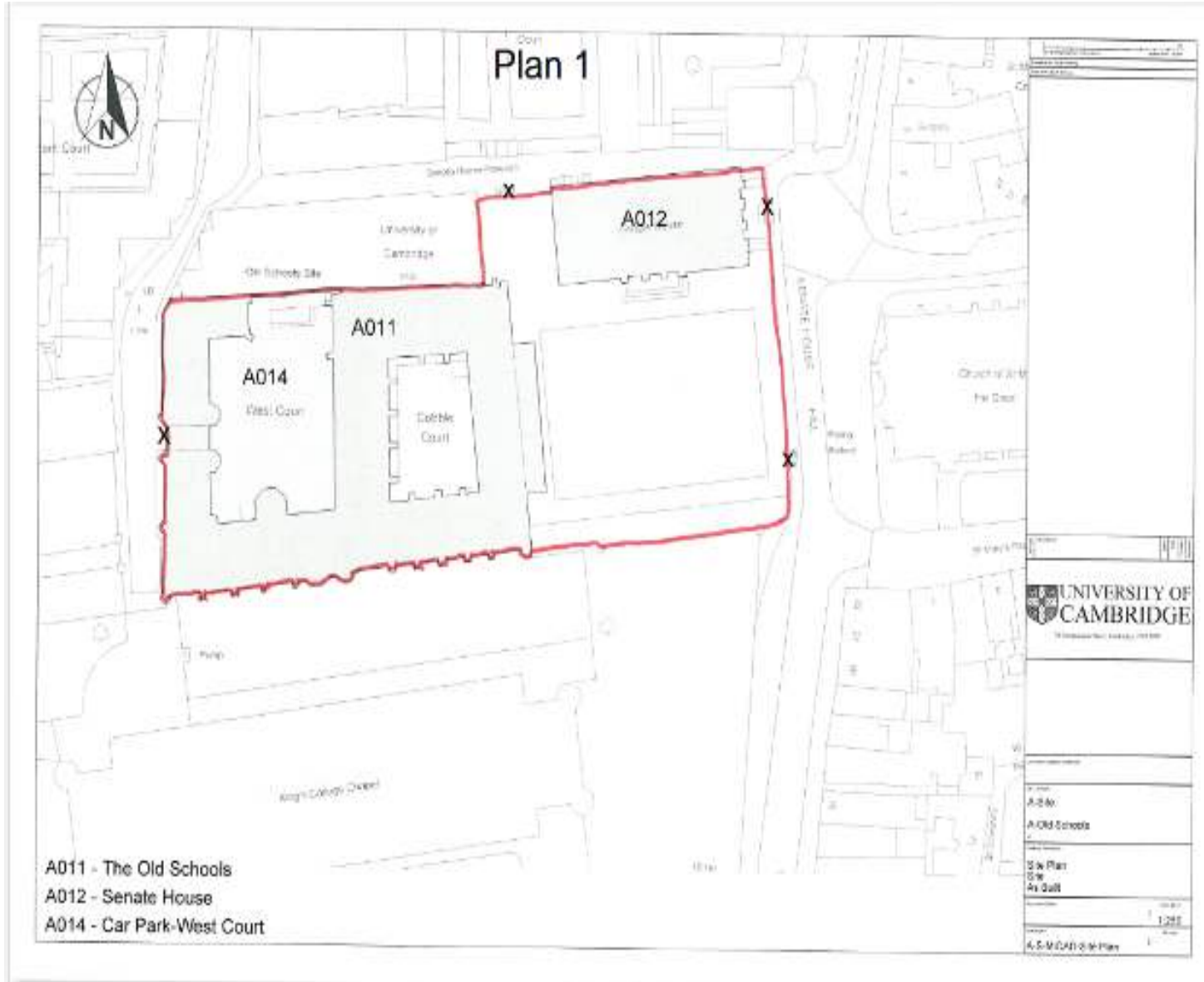
Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge, CB2 1PH

Ref: 0001200-1698

Email address: millsreeve100@mills-reeve.com

Dated: []

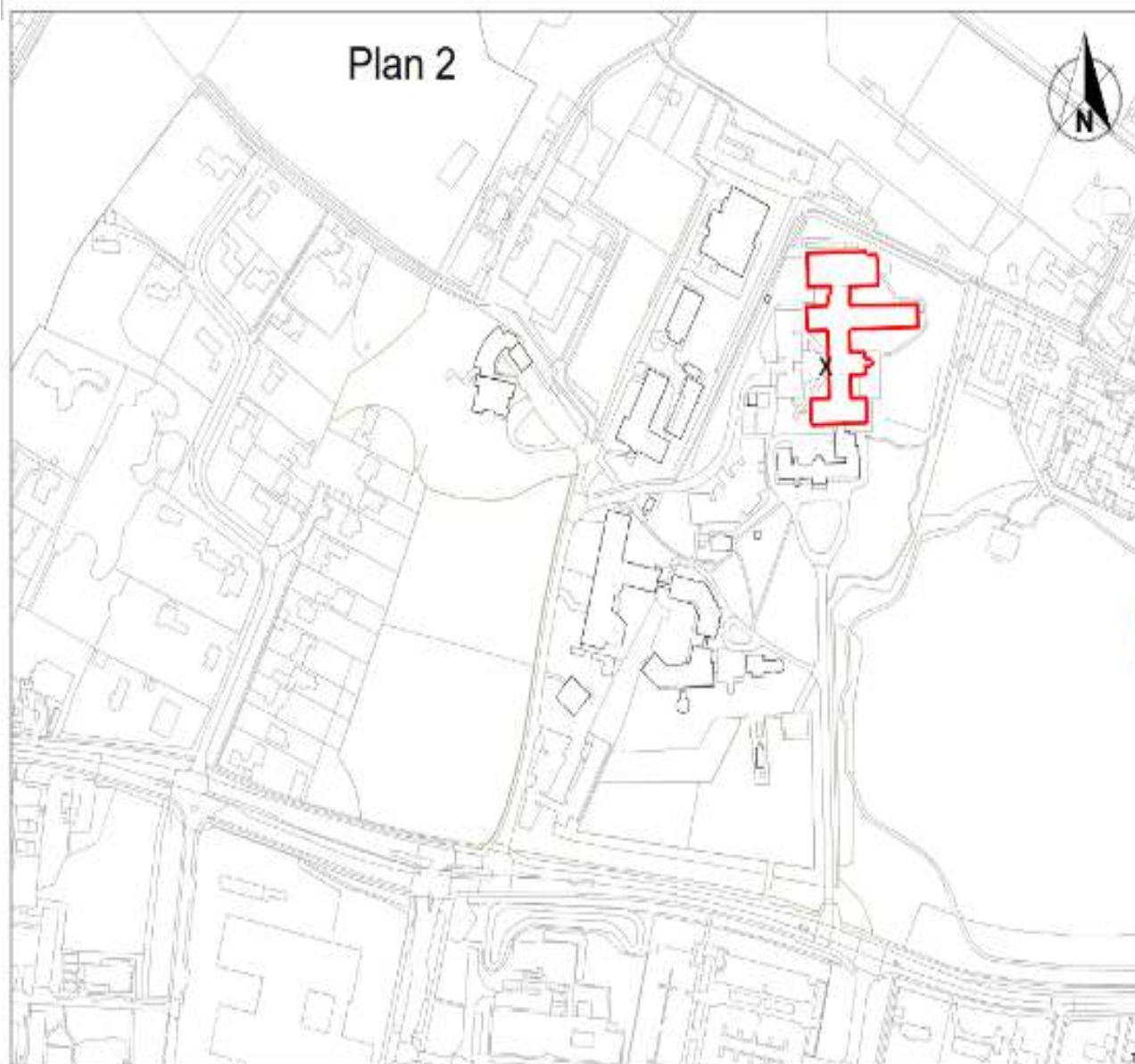
SCHEDULE 1 - PLANS



Plan 2



Revisions	
No.	Description
1	Issue for comment
2	Final



Project Name	
T-Site XX-Not Applicable Level T-Madingley Rise Site	
Site Location Plan Site As Built	
Project No. of valid copies	
1	
POD: UNDER CHANGE	1/1000
T-Site-MCAD Madingley Rise Site Plan	

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 1-3 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 - EMAIL ADDRESSES

- cambridge4palestine@proton.me
- encampmentnegotiations@proton.me
- bloodonyourhands@systemli.org