

N244

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

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Name of court High Court of Justice Chancery 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.) MOOG WOLVERHAMPTON LIMITED MOOG FERNAU LIMITED MOOG READING LIMITED MOOG CONTROLS LIMITED			
Defendant's name (including ref.) See Schedule 1			
Interested parties:			
Date		4 September 2025	

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

(1) Moog Wolverhampton Limited, (2) Moog Fernau Limited, (3) Moog Reading Limited, (4) Moog Controls Limited

2. Are you a

☒ Claimant☐ Defendant☐ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

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

The Claimants seek interim injunctive relief pursuant to s37(1) of the Senior Courts Act 1981 and CPR 25.1(1)(a) to restrain acts of trespass and public nuisance.

The Claimants also seek an order for notification/ service on 'Persons Unknown'.

The Claimants intend to make this application without notice to the Defendants, and on an urgent basis.

☒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? Is this time estimate agreed by all parties?

2

Hours

00

Minutes

☐Yes ☒No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

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.

The Claimants seek an order for service on persons unknown.

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
04	09	2025

Full name

Elwira Kelly

Name of applicant’s legal representative’s firm

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

Senior Vice President, General Counsel and Corporate Secretary

Applicant's address to which documents should be sent.

Building and street

Moog Wolverhampton Limited

Second line of address

Valiant Way

Town or city

Wolverhampton, West Midlands

County (optional)

United Kingdom

Postcode

W	V	9	5	G	B	
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If applicable

Phone number

Fax phone number

DX number

Your Ref.

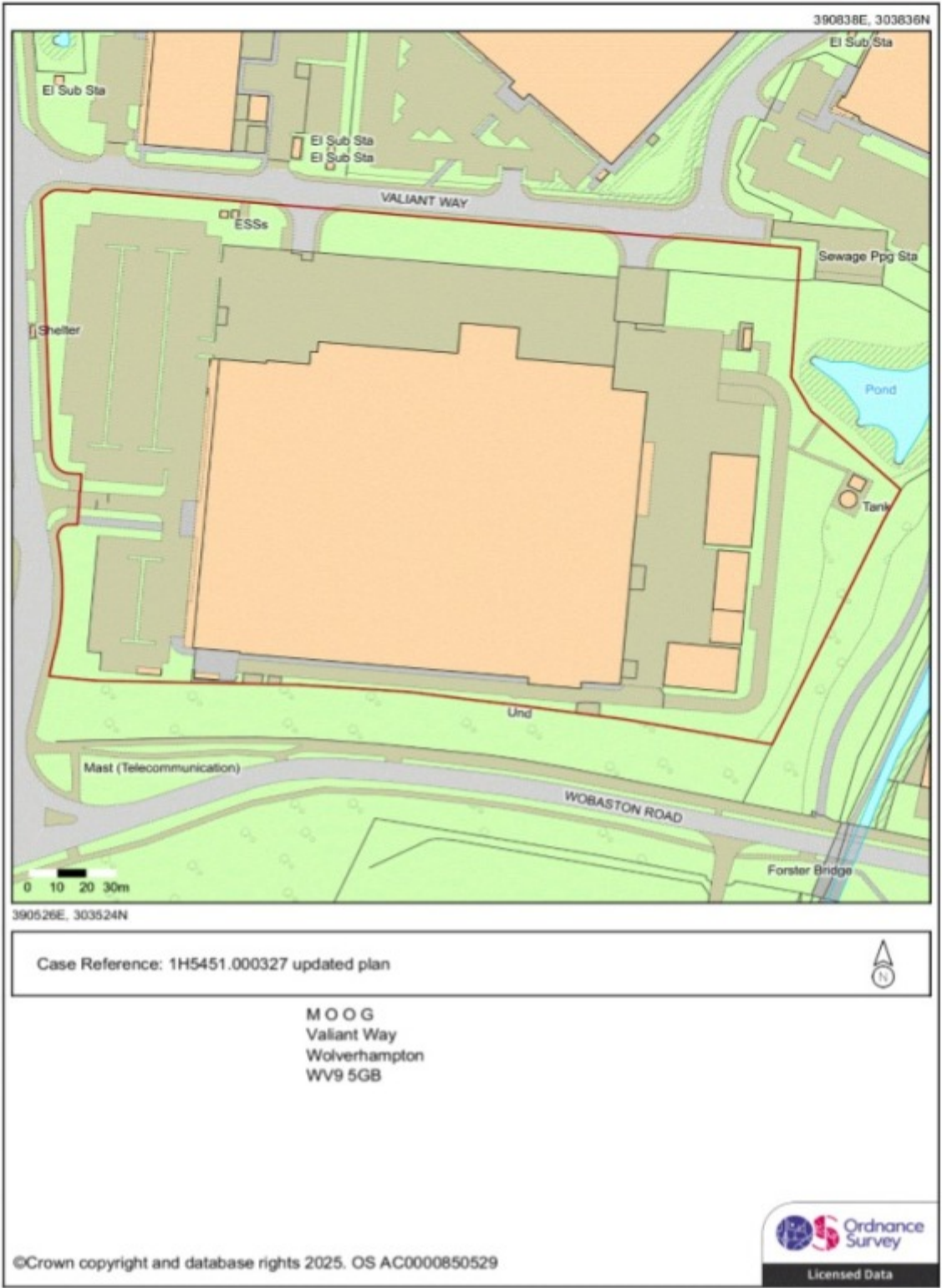
Email

MoogLegal@moog.com

SCHEDULE 1 - LIST OF DEFENDANTS

- (1) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1 BEING MOOG AIRCRAFT GROUP WOLVERHAMPTON, VALIANT WAY, PENDEFORD, WOLVERHAMPTON WV9 5GB, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND AND PREMISES
- (2) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2 BEING MOOG CONTROLS LTD LUTON, UNITS C AND J AIRPORT EXECUTIVE PARK, PRESIDENT WAY, LUTON LU2 9NY, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND AND PREMISES
- (3) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3 BEING MOOG READING LIMITED, 30 SUTTONS BUSINESS PARK, READING, BERKSHIRE RG6 1AW, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND AND PREMISES
- (4) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4 BEING MOOG AIRCRAFT GROUP TEWKESBURY, ASHCHURCH, TEWKESBURY, GLOUCESTERSHIRE GL20 8NA, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND AND PREMISES
- (5) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5 BEING MOOG INDUSTRIAL GROUP, ASHCHURCH PARKWAY, TEWKESBURY, GLOUCESTERSHIRE GL20 8TU, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND AND PREMISES

Plan 1



H.M. LAND REGISTRY		TITLE NUMBER	
		BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
COUNTY BEDFORDSHIRE		DISTRICT LUTON	
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ADMINISTRATIVE AREA LUTON

Plan 2

TL 1122
TL 1121

EATON GREEN ROAD

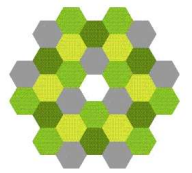
Airport
Executive
Park

PRESIDENT WAY

AIRPORT APPROACH ROAD



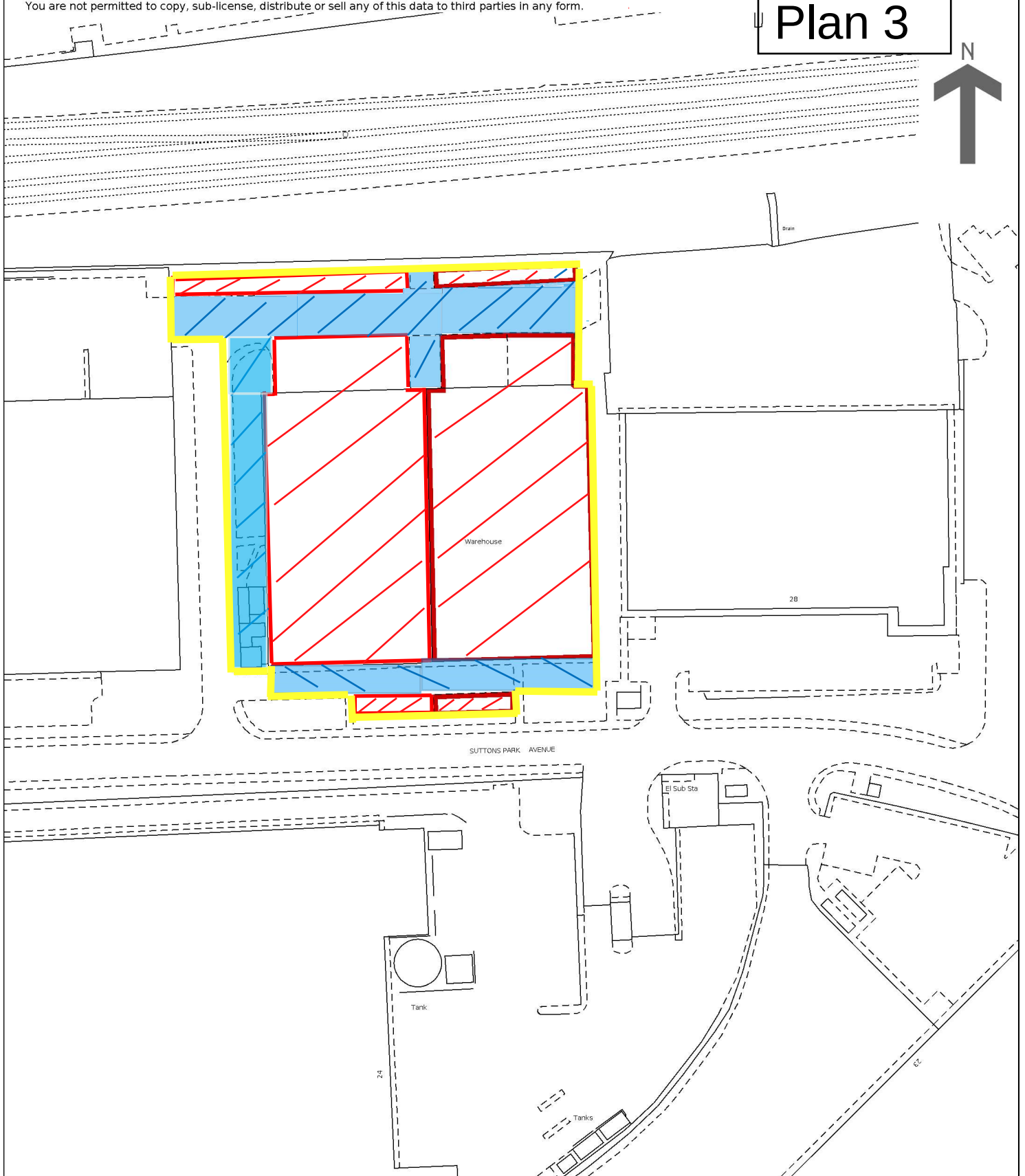
159 km



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Plan 3





Official copy of
title plan

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Plan 4



Formal
Industrial Park

ESS

MHIS

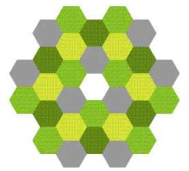
Factory

Tanks

ESS

ESS

Services



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Plan 5

