

N244

Application notice

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|                                                                                                                                        |  |                                   |  |
|----------------------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------|--|
| Name of court<br>High Court of Justice<br>Chancery Division                                                                            |  | Claim no.<br>PT-2025-000910       |  |
| Fee account no.<br>(if applicable)                                                                                                     |  | Help with Fees<br>(if applicable) |  |
|                                                                                                                                        |  | H W F - - - - -                   |  |
| Warrant no.<br>(if applicable)                                                                                                         |  | PT-2025-000910                    |  |
| Claimant's name (including ref.)<br>MOOG WOLVERHAMPTON LIMITED<br>MOOG FERNAU LIMITED<br>MOOG READING LIMITED<br>MOOG CONTROLS LIMITED |  |                                   |  |
| Defendant's name (including ref.)<br>See Schedule 1                                                                                    |  |                                   |  |
| Interested parties:                                                                                                                    |  |                                   |  |
| Date                                                                                                                                   |  | 1 October 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 permission to rely on the Third Witness Statement of Elwira Kelly (“EK3”) in support of the Claimants’ application dated 15 September 2025 to continue the injunction granted by Meade J on 5 September 2025 and for additional injunctive relief as set out in the Claimants’ Application Notice of 4 September 2025.

The Claimants’ also seek provision in the draft order appended to its application of 15 September 2025 for the grant of permission to adduce supplemental witness evidence (EK3).

The application is to be heard at a return date of 6 October 2025 and as such we would ask for this application to be considered on that occasion.

☒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?

0

Hours

10

Minutes

☐Yes ☒No

7. Give details of any fixed trial date or period

Return date of 6 October 2025

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 will serve / notify the Defendants pursuant to the service / notification provisions in the order of Meade J dated 5 September 2025.

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 application of 15 September 2025 which this would support is already listed for hearing on 6 October 2025 and so this application can usefully be considered at that hearing. We believe that this application can comfortably be accommodated within the time allowed for that hearing and hence the 10 minutes estimate in box 6 above has been suggested as a maximum on that basis.

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 |
| 01  | 10    | 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

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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 RED 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 RED 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