

Notice of HEARING OF INJUNCTION APPLICATION

To the Defendant

Persons Unknown
The Library, Sussex House
The Innovation Centre & Bramber
House, University of Sussex
Falmer Hill
Falmer, East Sussex

In the BRIGHTON County Court	
Claim Number	6BN06256
Claimant (including ref.)	University of Sussex 0322/BN/SUS5-645
Defendant (including ref.)	Persons Unknown + 1 other
Date	23 November 2006



TAKE NOTICE that the HEARING OF INJUNCTION APPLICATION will take place on

11 December 2006 at 12:00 PM

at Brighton County Court, William Street, Brighton, East Sussex, BN2 0RF

When you should attend

30 MINUTES has been allowed for the HEARING OF INJUNCTION APPLICATION

Please Note: This case may be released to another Judge, possibly at a different Court

If you have any special needs when coming to a court hearing please contact the court in advance and we will aim to meet your requirements.

Cases are listed in accordance with local hearing arrangements determined by the Judiciary and implemented by court staff. Every effort is made to ensure that hearings start either at the time specified or as soon as possible thereafter. However, listing practices or other factors may mean that delay is unavoidable. Furthermore, in some instances a case may be released to another judge, possibly at a different court. Please contact the court for further information on the listing arrangements that may apply to your hearing.

Injunction Order

University of Sussex Claimant

Nick Macgowan and Persons Unknown
Defendants

Nick Macgowan and Persons Unknown
The Library, Sussex House
The Innovation Centre &
Bramber House
University of Sussex
Falmer Hill, Falmer, E. Sussex

In the BRIGHTON County Court	
Claim Number	6BN06256
Claimant's Ref	0322/BN/SUS5-645
Defendant's Ref	
Issued on	23 November 2006

If you do not obey this order you will be guilty of contempt of court and you may be sent to prison

On 23 November 2006 the court considered an application for an injunction

UPON hearing Counsel for the Claimant

AND UPON the Claimant, by its Counsel, undertaking to the Court to pay any damages which the Defendants (or any other parties served with or notified of this Order) a stay in which the Court considers the Claimant should pay then

IT IS ORDERED THAT

Nick Macgowan and all other unnamed Defendants
be **forbidden** (whether by himself or by instructing or encouraging any other person)

1. The Defendants be prohibited from trespassing on the claimant's property by entering the Library, Sussex House, the Innovation Centre and Bramber ~~Close~~ ^{House} at the University of Sussex in connection with any protest or campaign.
2. The Defendants be prohibited from engaging in conduct such as to constitute an interference with the lawful business use of the Claimant by occupying the Library, Sussex House, the Innovation Centre and Bramber ~~Close~~ ^{House} at the University of Sussex and be prohibited from entering them.

This order shall remain in force until 11 December 2006 at 23:59 p.m. unless before then it is revoked by further order of the court

IT IS ALSO ORDERED THAT

1. Pursuant to CPR 6.8, service of the Claimant Form, Form N16A, Witness Statement of Tina George and Exhibit and Order be permitted by affixing of the documents to the entrances to the Library, Sussex House, the Innovation Centre and Bramber House, and by sending copies by e-mail to SvenMacGowan@yahoo.co.uk and that service will be deemed when the documents are posted or sent.
2. The matter be listed for hearing on 11th December 2006 at 12:00 with a time estimate of 30 minutes. There be liberty for any person affected by this Order to apply to the Court to vary, stay, or set aside upon 48 hours notice.
3. Costs be reserved to the adjourned hearing.

Notice of further hearing

The court will reconsider the application and whether the order should continue at a further hearing at Brighton County Court, William Street, Brighton, East Sussex, BN2 0RF on 11 December 2006 at 12:00 p.m.

If you do not attend at the time shown the court may make an injunction order in your absence.

You are entitled to apply to the court to reconsider the order before the day.

If you do not understand anything in this order you should go to a Solicitor, Legal Advice Centre or a Citizen's Advice Bureau



Claim Form (CPR Part 8)

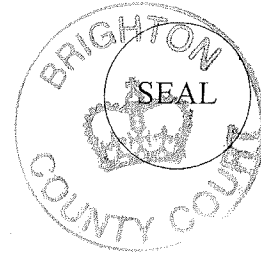
In the Brighton County Court

Claim No.

6BN06256

Claimant

University of Sussex
Sussex House
Falmer
East Sussex
BN1 9RH



Defendant(s)

Nick MacGowan and Persons Unknown
The Library, Sussex House
The Innovation Centre and Bramber House
University of Sussex
Falmer Hill
Falmer
East Sussex

Brighton County Court
William Street
Brighton
BN2 0RF

Does your claim include any issues under the Human Rights Act 1998? Yes No

Details of claim (see also overleaf)

A Claim for an Injunction to prevent the anticipated trespass of buildings at the University of Sussex by Persons Unknown.

£

Defendant's name and address
Nick MacGowan and Persons Unknown
The Library, Sussex House
The Innovation Centre and Bramber House
University of Sussex
Falmer Hill
Falmer
East Sussex

Court fee	£ 150.00
Solicitor's costs	To be assessed
Issue date	23 NOV 2006

The court office at Brighton County Court

is open between 10 am and 4 pm Monday to Friday. When corresponding with the court, please address forms or letters to the Court Manager and quote the case number.

N208 Claim form (CPR Part 8) (10.00)

Claim No.

Details of claim (continued)

Statement of Truth

*(I believe)(The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement

Full Name Tina Rebecca George

Name of claimant's solicitor's firm DMH Stallard

signed  position or office held Partner

*(~~Claimant~~)(~~Legal friend~~)(Claimant's solicitor)(if signing on behalf of firm or company)

*delete as appropriate

DMH Stallard
100 Queens Road
Brighton
East Sussex
BN1 3YB

Claimant's or claimant's solicitor's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

DX 2703 BRIGHTON 1

Ref: 0322/BN/SUS5-645

IN THE BRIGHTON COUNTY COURT

Claim No:

6BN06256

BETWEEN

UNIVERSITY OF SUSSEX

Claimant

-and-

NICK MACGOWAN AND PERSONS UNKNOWN

Defendants



PARTICULARS OF CLAIM

1. The Claimant is the owner of buildings located at the University of Sussex campus which includes the Library premises, Sussex House (the University's central administration building), the Innovation Centre (which houses various technology businesses with links to academic aspects of the University occupying units within the building) and Bramber House (which includes the University's business and conference centre). The Innovation Centre is leased to Sussex Innovation Centre Limited, which is a wholly owned subsidiary of the Claimant, set up to manage the Innovation Centre.
2. On or about 15 November 2006 the Claimant received a communication from a person identifying himself as Nick MacGowan. The document was addressed to all the University of Sussex Library staff and confirmed that a number of students would be occupying the Library in support of the "Sort us out" campaign and as a protest against tuition fees, on Tuesday 28 November 2006. The notification invited contact to be made in order for a meeting to be arranged. The

contact details were given for Nick MacGowan care of an e-mail address of SvenMacGowan@yahoo.co.uk. The Claimant has been told that the name "Nick MacGowan" is a collective identity for the organisers of the intended Library occupation and continues its attempts by e-mail correspondence to meet with the protestors with a view to avoiding the threatened occupation.

3. The threatened occupation of the library would constitute a trespass to land.
4. The threatened actions of the Defendants also constitute an interference with the lawful business of the Claimant insofar as the Library, Sussex house, the Innovation Centre and Bramber House are key administrative buildings and service centres used in connection with the business of the University.
5. The Claimant believes that the Defendants will carry out their threats to occupy the library and possibly other buildings at the University of Sussex unless restrained by Order of the Court. This belief is supported by the fact that there have been a number of recent incidents involving occupation of the University buildings including the occupation of the Innovation Centre in May 2006.
6. The Claimant is unable to sufficiently identify the Defendants to effect service of the proceedings. It is believed that if notice were to be given to Nick MacGowan, as representative for the Defendants (by email or otherwise), in advance of an injunction being sought this would accelerate the intended occupation of the building.

AND THE CLAIMANT CLAIMS:-

An Order that:

1. The Defendants be prohibited from trespassing on the Claimant's property by entering the Library, Sussex House, the Innovation Centre and Bramber Close at the University of Sussex in connection with any protest or campaign;
2. The Defendants be prohibited from engaging in conduct such as to constitute an interference with the lawful business use of the Claimant, by occupying the Library, Sussex House, the Innovation Centre and Bramber Close at the University of Sussex and be prohibited from entering them;
3. Pursuant to CPR 6.8 service of the Claim Form, Form N16A, Witness Statement of Tina George and Exhibit and Order be permitted by the affixing of the documents to the entrances to the Library, Sussex House, the Innovation Centre and Bramber House, and by sending copies by email to svenMacGowan@yahoo.co.uk and that service will be deemed when the documents are so posted or sent.
4. Costs.

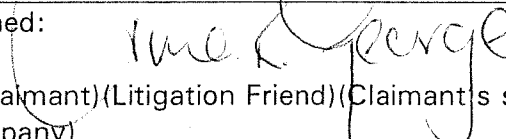
Statement of Truth

*(I believe) (The Claimant believes) that the facts stated in this statement are true.

*I am duly authorised by the claimant to sign this statement

Full name: Tina Rebecca George

Name of Claimant's solicitors' firm: DMH Stallard

Signed:  Position or office held: Partner
*(Claimant)(Litigation Friend)(Claimant's solicitor)(if signing on behalf of firm or company)
*delete as appropriate

Dated: 22 November 2006

DMH Stallard
100 Queens Road
Brighton
East Sussex
BN1 3YB

Ref: 0322/SUS5-645
Solicitors for the Claimant

IN THE BRIGHTON COUNTY COURT

Claim No:

6BN06256

BETWEEN

UNIVERISTY OF SUSSEX

-and-

NICK MACGOWAN AND PERSONS UNKNOWN



ANNEXE 1

LIBRARY OCCUPATION

Debby

To all University of Sussex Library staff,

Hello!

This message is to let you know that there will be another occupation of the library by students in support of the Sort US Out campaign and as a protest against tuition fees on the night of Tuesday 28th November 2006. The occupation will last from closing-time until opening-time the following morning. This action will soon be widely publicised on campus, but we felt it would be good to let you know in advance, particularly to stress that this action is in no way aimed against library staff. On the contrary, we feel that as students we have common cause with library staff in criticising the way the library is being under-resourced and under-staffed by University management.

Of course we are aware that the occupation might inconvenience several of you, and for that we apologise in advance. We hope that we could find a way of making it up to those members of staff who are asked by library management to remain in the library during the occupation. We would also like to stress that the occupation is intended to keep the library open - it is in no way our intention that the library should be closed either before or after the occupation. Similarly we would like to stress that the occupation will respect all the usual library regulations (no eating, drinking, smoking etc), and ensure that no damage is done to library books or infrastructure.

If you would like to discuss any of this with us, or any concerns you might have, we would be happy to attend a staff meeting or arrange a meeting at another date.

Best wishes,

Nick MacGowan

svenmacgowan@yahoo.co.uk

CLAIM NO:
IN THE BRIGHTON COUNTY COURT

BETWEEN

UNIVERSITY OF SUSSEX

Claimant

-and-

**NICK MACGOWAN AND PERSONS
UNKNOWN**

Defendants

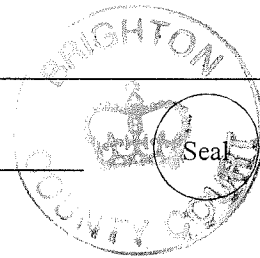
PARTICULARS OF CLAIM

DMH Stallard
100 Queens Road Brighton
East Sussex BN1 3YB

Ref: 0322/SUS5-645

Application for Injunction (General Form)

Name of court	Claim No.
Brighton County Court	GBN06256
Claimant's Name and Ref. University of Sussex Ref: 0322/BN/SUS5-645	
Defendant's Name and Ref. Nick MacGowan and Persons Unknown	



Notes on completion
Tick which boxes apply and specify the legislation where appropriate

- (1) Enter the full name of the person making the application
- (2) Enter the full name of the person the injunction is to be directed to
- (3) Set out here the proposed terms of the injunction order (if the defendant is a limited company delete the wording in brackets and insert "whether by its servants, agents, officers or otherwise")
- (4) Set out here any proposed mandatory orders requiring acts to be done
- (5) Set out here any further terms asked for including provision for costs
- (6) Enter the names of all persons who have sworn affidavits or signed statements in support of this application
- (7) Enter the names and addresses of all persons upon whom it is intended to serve this application
- (8) Enter the full name and address for service and delete as required

- By application in pending proceedings
- Under Statutory provision _____
- This application is made under Part 8 of the Civil Procedure Rules

This application raises issues under the Human Rights Act 1998 Yes No

The Claimant⁽¹⁾ University of Sussex

applies to the court for an injunction order in the following terms:

That the Defendant⁽²⁾ Nick MacGowan and Persons Unknown

be forbidden (whether by himself or by instructing or encouraging any other person)⁽³⁾ See 1 in Addendum

And that the Defendant⁽⁴⁾

And that⁽⁵⁾

The Defendants pay the Claimant's costs of this application.

The grounds of this application are set out in the written evidence

of⁽⁶⁾ Tina Rebecca George sworn (signed) on 22/11/06

This written evidence is served with this application.

This application is to be served upon⁽⁷⁾

Nick MacGowan and Persons Unknown, The Library, Sussex House, The Innovation Centre and Bramber House, University of Sussex, Falmer Hill, Falmer, East Sussex

This application is filed by⁽⁸⁾ DMH Stallard

(the Solicitors for) the Claimant (Applicant/~~Person~~)

whose address for service is 100 Queens Road, Brighton, East Sussex, BN1 3YB

Signed

Dated 22/11/06

This section to be completed by the court

* Name and address of the person application is directed to

To* of
This application will be heard by the (District) Judge
at
on the day of [20] at o'clock

If you do not attend at the time shown the court may make an injunction order in your absence

If you do not fully understand this application you should go to a Solicitor, Legal Advice Centre or a Citizens' Advice Bureau

The court office at

is open between 10am and 4pm Mon - Fri. When corresponding with the court, please address all forms and letters to the Court Manager and quote the claim number.

N16A General form of application for injunction (09.04)

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Addendum

1. An Order that:

1. The Defendants be prohibited from trespassing on the Claimant's property by entering the Library, Sussex House, the Innovation Centre and Bramber Close at the University of Sussex in connection with any protest or campaign;

2. The Defendants be prohibited from engaging in conduct such as to constitute an interference with the lawful business use of the Claimant, by occupying the Library, Sussex House, the Innovation Centre and Bramber Close at the University of Sussex and be prohibited from entering them;

3. Service of the proceedings be permitted by the affixing of the documents to the entrances to the Library, Sussex House, the Innovation Centre and Bramber House, and by sending copies by email to svenmacgowan@yahoo.co.uk and that service will be deemed when the documents are so posted or sent.

Claimant
Tina Rebecca George
1st Witness Statement
Signed: 22.11.06
Filed: 23.11.06

IN THE BRIGHTON COUNTY COURT

CLAIM No:

GRN 06256

BETWEEN

UNIVERSITY OF SUSSEX

-and-

NICK MACGOWAN AND PERSONS UNKNOWN



WITNESS STATEMENT OF TINA REBECCA GEORGE

I, Tina Rebecca George, of 100 Queens Road, Brighton, East Sussex, BN1 3YB, will say as follows:-

1. I am a Partner of DMH Stallard, Solicitors for the University of Sussex. The matters referred to in this witness statement are based on information given to me by Philip Harvey, Registrar of the University of Sussex, by e-mail and telephone. On this basis I believe the contents of this statement to be true. There is now produced and shown to me an exhibit bundle marked "TRG1" containing true copies of documents which I will refer to by page number during the course of this statement.
2. This statement is made in support of an application by the University for an injunction against persons unknown. At page 1 of TRG1 appears the note received by the University of Sussex from a person identifying himself as Nick

MacGowan. The note sets out the proposed occupation of the Library by students in support of the "Sort us out" campaign and as a protest against tuition fees on 28 November 2006. A response was sent to Mr MacGowan at the stated e-mail address on 17 November 2006 (see page 2 of TRG1) to ascertain its authenticity and requesting confirmation that the recipient of that e-mail was in fact the author of the letter. A response was received to that e-mail on 20 November (page 3 of TRG1) confirming that Nick MacGowan is the collective identity for the organisers of the Library occupation. It confirms that the occupation is not negotiable with the University Management or it's lawyers.

3. The University believes that the occupation of the library, and possibly other buildings, will proceed as planned on 28 November 2006. There have been a number of previous incidents where buildings have been occupied on the campus as a student protest, most recently the Innovation Centre that was occupied in May 2006.
4. The University continues to attempt to negotiate with the students concerned to see if the intended protest can be avoided. A further e-mail was sent to Mr MacGowan on 22 November 2006 proposing that a meeting be held between University staff and the protestors on either 23 or 24 November. At the time of making this statement it is not known whether the protesters will agree to meet and whether the protest can be avoided.
5. If the occupation goes ahead then this will severely interrupt the lawful business of the University. Although the Library has been specifically mentioned by the students, it is anticipated that this could easily extend to other buildings on the University campus including Sussex House, the Innovation Centre and Bramber House, all of which are key administrative buildings and service centres of the University.
6. The University seeks an injunction in the terms of the application. It recognises that if the Court grants such an application it will not be effective until it is

brought to the knowledge of the individuals who intend to occupy. The Claimant is seeking the Court's permission to allow service by an alternative method pursuant to CPR 6.8. It is proposed that service of the Claim Form and related proceedings is effected by fixing these documents to the entrances to the Library and any other buildings falling within the parameters of the Injunction Order granted, and in addition by scanning and sending copies of the proceedings and Orders to svenmacgowan@yahoo.co.uk. The Claimant wishes to serve the documents by the method stated above and for service to be deemed within 12 hours of the documents being attached to the entrances.

7. The application for an injunction order is made without notice to the defendants. The Claimant genuinely believes that if advance notice is given about the proceedings this will precipitate the protest being brought forward to an earlier date.
8. I confirm the contents of this statement are true.

Statement of Truth

*(I believe) (The Claimant believes) that the facts stated in this statement are true.

*I am duly authorised by the claimant to sign this statement

Full name Tina Rebecca George

Name of Claimant's solicitors' firm: DMH Stallard

Signed:  Position or office held: Partner

*(Claimant)(Litigation Friend)(Claimant's solicitor)(if signing on behalf of firm or company)

*delete as appropriate

Dated: 22 November 2006

IN THE BRIGHTON COUNTY COURT

Claim No:

BETWEEN

UNIVERSITY OF SUSSEX

Claimant

-and-

**NICK MACGOWAN AND PERSONS
UNKNOWN**

Defendants

**WITNESS STATEMENT OF TINA REBECCA
GEORGE**

100 Queens Road Brighton
East Sussex BN1 3YB

Ref: 0322/SUS5-645

DMH Stallard is the merged firm of DMH and Stallard
Solicitors

Claimant
Tina Rebecca George
1st Witness Statement
Filed:

IN THE BRIGHTON COUNTY COURT

CLAIM NO:

BETWEEN

6BNO6256

UNIVERSITY OF SUSSEX

-and-

NICK MACGOWAN AND PERSONS UNKNOWN



Defendants

EXHIBIT "TRG1"

This is the exhibit marked "TRG1" to the witness statement of Tina Rebecca George

LIBRARY OCCUPATION

Debby

To all University of Sussex Library staff,

Hello!

This message is to let you know that there will be another occupation of the library by students in support of the Sort US Out campaign and as a protest against tuition fees on the night of Tuesday 28th November 2006. The occupation will last from closing-time until opening-time the following morning. This action will soon be widely publicised on campus, but we felt it would be good to let you know in advance, particularly to stress that this action is in no way aimed against library staff. On the contrary, we feel that as students we have common cause with library staff in criticising the way the library is being under-resourced and under-staffed by University management.

Of course we are aware that the occupation might inconvenience several of you, and for that we apologise in advance. We hope that we could find a way of making it up to those members of staff who are asked by library management to remain in the library during the occupation. We would also like to stress that the occupation is intended to keep the library open - it is in no way our intention that the library should be closed either before or after the occupation. Similarly we would like to stress that the occupation will respect all the usual library regulations (no eating, drinking, smoking etc), and ensure that no damage is done to library books or infrastructure.

If you would like to discuss any of this with us, or any concerns you might have, we would be happy to attend a staff meeting or arrange a meeting at another date.

Best wishes,

Nick MacGowan

svenmacgowan@yahoo.co.uk

George, Tina

From: George, Tina
Sent: 17 November 2006 11:39
To: 'svenmacgowan@yahoo.co.uk'
Subject: University of Sussex

Importance: High

To Mr. MacGowan

I am instructed on behalf of the University of Sussex in connection with a communication that has been received addressed to "All University of Sussex Library staff", concerning the Library facilities at the University and an alleged protest. The author of that letter is stated to be you, Nick MacGowan, care of this email address.

I would be grateful if you could confirm that you, as recipient of this email, are in fact the author of that letter. The purpose of asking is to enable us to verify the authenticity of the document and the contents of it. If the letter was genuinely sent by you, I would ask you to confirm that fact by return of email, and would ask you to suggest suitable dates for a meeting with the University as outlined in the last paragraph of your letter.

I await your urgent response please.

Yours sincerely
Tina George
Partner
DMH Stallard
(01273) 744295

George, Tina

From: Nick MacGowan [svenmacgowan@yahoo.co.uk]
Sent: 20 November 2006 20:15
To: George, Tina
Subject: Re: University of Sussex

Hello Tina,

Nick MacGowan is a collective identity for the organisers of the library occupation. Our letter was addressed to the library staff, as was our offer of a meeting to explain the reasons for the occupation, and to give library staff the chance to voice any concerns they might have. The occupation is not negotiable with University management or its lawyers.

Our very best wishes,

Nick MacGowan

----- Original Message -----

From: "George, Tina" <Tina.George@dmhstallard.com>
To: svenmacgowan@yahoo.co.uk
Sent: Friday, 17 November, 2006 11:39:24 AM
Subject: University of Sussex

To Mr. MacGowan

I am instructed on behalf of the University of Sussex in connection with a communication that has been received addressed to "All University of Sussex Library staff", concerning the Library facilities at the University and an alleged protest. The author of that letter is stated to be you, Nick MacGowan, care of this email address.

I would be grateful if you could confirm that you, as recipient of this email, are in fact the author of that letter. The purpose of asking is to enable us to verify the authenticity of the document and the contents of it. If the letter was genuinely sent by you, I would ask you to confirm that fact by return of email, and would ask you to suggest suitable dates for a meeting with the University as outlined in the last paragraph of your letter.

I await your urgent response please.

Yours sincerely
Tina George
Partner
DMH Stallard
(01273) 744295

DMH Stallard
100 Queens Road Brighton BN1 3YB
www.dmhstallard.com DX 2703 Brighton 1
Offices in Brighton, Crawley/Gatwick and London.

A member of Law Europe and IBLC ensuring that we are represented in over 68 countries. Regulated by The Law Society.
A list of partners is available for inspection from 100 Queens Road Brighton East Sussex BN1 3YB
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DMH Stallard is the merged firm of DMH and Stallard Solicitors

21/11/2006

IN THE BRIGHTON COUNTY COURT

Claim No:

6BN06256

BETWEEN

UNIVERSITY OF SUSSEX

Claimant

-and-

NICK MACGOWAN AND PERSONS UNKNOWN

Defendant

DRAFT ORDER

UPON the Claimant's application for an Injunction without notice

UPON hearing Counsel for the Claimant

AND UPON the Claimant, by it's Counsel, undertaking to the Court to pay any damages which the Defendants (or any other parties served with or notified of this Order) a stay in which the Court considers the Claimant should pay then

IT IS ORDERED THAT :

1. The Defendants be prohibited from trespassing on the Claimant's property by entering the Library, Sussex House, the Innovation Centre and Bramber Close at the University of Sussex in connection with any protest or campaign;
2. The Defendants be prohibited from engaging in conduct such as to constitute an interference with the lawful business use of the

Claimant, by occupying the Library, Sussex House, the Innovation Centre and Bramber Close at the University of Sussex and be prohibited from entering them;

3. Pursuant to CPR 6.8 service of the Claim Form, Form N16A, Witness Statement of Tina George and Exhibit and Order be permitted by the affixing of the documents to the entrances to the Library, Sussex House, the Innovation Centre and Bramber House, and by sending copies by email to svenMacGowan@yahoo.co.uk and that service will be deemed when the documents are so posted or sent.

4. Costs.

IF A PERSON TO WHOM THIS ORDER RELATES, AND WHO HAS KNOWLEDGE OF IT, DISOBEYS THE ORDER THEY MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

Dated this 23 day of November 2006

.....
DMH Stallard
100 Queens Road
Brighton
East Sussex
BN1 3YB

Ref: 0322/SUS5-645
Solicitors for the Claimant

CLAIM NO:
IN THE BRIGHTON COUNTY COURT

BETWEEN

UNIVERSITY OF SUSSEX

Claimant

-and-

**NICK MACGOWAN AND PERSONS
UNKNOWN**

Defendants

DRAFT ORDER

DMH Stallard
100 Queens Road Brighton
East Sussex BN1 3YB

Ref: 0322/SUS5-645