

Party: Claimants
Witness: S Wortley
Statement: Fourth
Exhibits: None
Date: 27.02.24

CLAIM NO QB-2022-000406

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N:

- (1) 1 LEADENHALL GP LIMITED
- (2) 1 LEADENHALL NOMINEE LIMITED
- (3) MULTIPLEX CONSTRUCTION EUROPE LIMITED

Claimants

and

PERSONS UNKNOWN ENTERING IN OR REMAINING AT
THE CONSTRUCTION SITE AT 1 LEADENHALL STREET,
LONDON EC3V 1PP WITHOUT THE CLAIMANTS'
PERMISSION

Defendants

WITNESS STATEMENT OF
STUART SHERBROOKE WORTLEY

I, STUART SHERBROOKE WORTLEY of 50/60 Station Road, Cambridge CB1 2JH WILL SAY as follows:-

1. In paragraph 17 of my Third Witness Statement dated 19 February 2024, I referred to the Claimants' intention to serve notice of the application to extend the current injunction by:-

- 1.1 uploading copies of the application and supporting witness statement to the Brookfield Properties injunction website; and
 - 1.2 posting notice of the application alongside the existing notices at the main entrance which refer to the injunction.
2. I confirm that on Monday 26 February 2024, the Brookfield Properties injunction website was duly amended to read as follows:-

"Important Legal Notice

The 1 Leadenhall Limited Partnership has obtained a High Court injunction preventing unauthorised access into the 1 Leadenhall development site. The injunction was sought against unnamed individuals who may seek to trespass in future.

The Claimants have applied to extend the injunction which was granted by Mr Justice Fraser on 15 February 2022.

The application will be heard in the Royal Courts of Justice, Strand, London WC2A 2LL on Wednesday 28 February 2024 at 10.30 am.

Copies of the Claimants' application dated 19 February 2024 and the supporting witness statement of Stuart Wortley dated 19 February 2024 are provided below.

- **[Application Notice \(Feb 2024\)](#)**
- **[Draft Order \(Feb 2024\)](#)**
- **[Witness Statement of Stuart Wortley dated 19.02.24](#)**
- **[Exhibit SSW10](#)**

- **[Claim Form dated 08.02.22](#)**
- **[Particulars of Claim](#)**
- **[Site Plan](#)**
- **[Application Notice](#)**
- **[Witness Statement of Peter Clarke dated 04.02.22](#)**
- **[Exhibits 'PC1' to 'PC4'](#)**
- **[Witness Statement of Stuart Wortley dated 08.02.22](#)**
- **[Exhibits SSW1 to SSW8](#)**
- **[Witness Statement of Stuart Wortley dated 14.02.22](#)**
- **[Exhibit SSW9](#)**
- **[Witness Statement of Peter Clarke dated 15.02.22](#)**
- **[Order of The Hon. Mr Justice Fraser](#)**

Further information relating to the injunction can be obtained by contacting Peter Clarke of Brookfield Properties at peter.clarke@brookfieldproperties.com

We take the safety of the public, our staff and contractors extremely seriously. Individuals who engage in persistently disruptive and dangerous behaviour put themselves and others at risk of significant harm. We will always act to prevent them from doing so."

3. I am informed by Peter Clarke and believe that on Monday 26 February 2024, further notices were posted adjacent to each of the existing warning notices in the following terms:-

"The Claimants have applied to extend the injunction which was granted by Mr Justice Fraser on 15 February 2022.

The application will be heard in the Royal Courts of Justice, Strand, London WC2A 2LL on Wednesday 28 February 2024 at 10.30 am.

Copies of the Claimants' application dated 19 February 2024 and the supporting witness statement of Stuart Wortley dated 19 February 2024 are available at:-

<https://www.brookfieldproperties.com/en/our-properties/detail/One-Leadenhall-Important-Legal-Notice.html>"

I believe that the facts stated in this Witness Statement and Exhibits are true.

I understand that proceedings for contempt of court may be brought against anyone 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 am duly authorised to make this statement on behalf of the Claimants.



Stuart Sherbrooke Wortley

27 February 2024