

1. Made on behalf of the Claimant
2. Balbinder Kaur
3. Statement No. 1
4. Exhibits: BK1
5. Dated: 22 January 2025

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION**

**Claim No. KB-2024-001199**

**IN THE MATTER OF SECTION 222 LOCAL GOVERNMENT ACT 1972**

**BETWEEN**

**THE MAYOR & BURGESSES OF  
THE LONDON BOROUGH OF ENFIELD**

**Claimant**

**-and-**

- (1) CHARLES SNELL
- (2) DAVID SNELL
- (3) STEPHEN MAY
- (4) ABDELLAH TAYEB (AKA CASTRO)
- (5) MICHAL WUJEK
- (6) PERSONS UNKNOWN

**Defendants**

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**WITNESS STATEMENT  
BALBINDER KAUR**

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I, **BALBINDER KAUR** of the London Borough of Enfield, Civic Centre, Silver Street, Enfield, EN1 3XA **WILL SAY AS FOLLOWS:**

1. I make this Witness Statement in support of the Claimant's Part 8 Claim seeking injunctive relief and the Injunction Order dated 12 June 2024 against the Defendants.
2. I am an Assistant Principal Lawyer working in the Legal Services Department of the London Borough of Enfield and am currently assigned to managing this claim on behalf of the council.

3. I exhibit to this witness statement a paginated exhibit bundle marked 'BK1', and references to the page number(s) herein are to page numbers within the exhibit bundle BK1. Where I do not have direct knowledge of the facts related in this witness statement, I indicate the source of my knowledge.

4. I confirm that all the following information was published and available on the London Borough of Enfield's website by approximately 16:42:16 BST on 25 June 2024 and have been accessible since that time:

1. Part 8 Claim Form (Trespass and Nuisance) (PDF, 254.04 KB) 18 April 2024
2. Application Notice (PDF, 242.18 KB) 18 April 2024
3. Draft Injunction Order undated (DOCX, 30.6 KB)
4. Claimant Skeleton Argument (DOCX, 43.44 KB) 18 April 2024
5. Order of Rory Dunlop KC (PDF, 124.13 KB) 1 May 2024
6. Judgement Rory Dunlop KC (PDF, 165.66 KB) 1 May 2024
7. Witness Statement of Karen Maguire (PDF, 233.77 KB) 18 April 2024
8. Exhibit Bundle to Witness Statement of Karen Maguire Part 1 (PDF, 16289.93 KB) 18 April 2024
9. Exhibit Bundle to Witness Statement of Karen Maguire Part 2 (PDF, 18173.39 KB) 18 April 2024
10. Second Witness Statement of Karen Maguire with Exhibits (PDF, 6459.99 KB) 7 May 2024
11. Witness Statement of Rauf Iqbal with Exhibits (PDF, 173.78 KB) 7 May 2024
12. Witness Statements of Service (PDF, 120 KB) (with Index of documents served and NoH but without exhibits as already provided herein) 25 April 2024
13. Witness Statement of Service (PDF, 856.67 KB) (with Index of documents served and Extension to Ds to serve evidence but without exhibits as already provided herein) 8 May 2024
14. Order of HHJ Auerbach (PDF, 3280.58 KB) 21 May 2024
15. Judgment HHJ Auerbach (PDF, 229.66 KB) 21 May 2024
16. Witness Statements of Service (PDF, 5632.02 KB) (with Index of docs served and NoH but without exhibits as already provided herein) 3 June 2024
17. Witness Statement of Service on Charles Snell (PDF, 289.54 KB) 6 June 2024
18. Claimant Skeleton Argument (DOCX, 51.14 KB) 6 June 2024
19. Order Mr Duncan Atkinson KC (PDF, 4578.46 KB) 12 June 2024
20. Judgment Mr Duncan Atkinson KC (PDF, 399.51 KB) 5 August 2024
21. Plan of the area covered by the injunction order (PDF, 4601.33 KB)

5. The webpage link where this information is posted is:

[Injunction order trespassers | Enfield Council](#)

6. I confirm that I did email the National Bargee Travellers Association on 30 June 2024 and 16 August 2024 and serve the following documents:

- i. Application Notice
- ii. The Claim Form
- iii. All orders and judgement including evidence, bundles and submissions

I refer to **Exhibit BK1/1-5**.



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- (11) MICHAL WUJEK**
- (12) PERSONS UNKNOWN**

**Defendants**

---

**EXHIBIT BK1**

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**From:** Balbinder Kaur  
**To:** [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)  
**Subject:** RE: KB-2024-001199 - LBE v Snell and ors  
**Date:** 30 June 2024 16:11:00  
**Attachments:** [Letter 18.6.24 with Order 12.6.24 for service on PU & Snells.pdf](#)  
[18. King's Bench Associate's-Order KB-2024-001199 - LBE v Snell & ors 12.06.24.pdf](#)

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Dear Ms Smith

Thank you for your email, I am currently in the process of preparing a bundle of papers for services upon yourselves - pending receipt of the finalised judgement of 12 June 2024. In the interim please find attached the following:

1. Sealed Order - 12.6.2024
2. Letter accompanying Sealed Order for Service on Persons unknown - 18.6.2024 (including webpage link) (and Order).

The webpage link is: <https://www.enfield.gov.uk/services/your-council/injunction-order>

Thank you.

Kind Regards

Balbinder Kaur  
Assistant Principal Lawyer  
Legal Services, Enfield Council  
Silver Street  
Enfield EN1 3XA

Telephone: 020 8132 0091

Fax: 020 8379 6492

Please note that I do not work on Friday Afternoons (from 11am) and any emails sent / calls made will not be addressed until my return to the office. If your matter is urgent then please contact [Antonia.makanjuola@enfield.gov.uk](mailto:Antonia.makanjuola@enfield.gov.uk)

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Think before copying others into emails

Legal advice in this email is subject to legal professional privilege and should not be disclosed without authorisation.

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

From: [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk) <[secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)>  
Sent: 28 June 2024 16:42  
To: Balbinder Kaur <[Balbinder.Kaur@Enfield.gov.uk](mailto:Balbinder.Kaur@Enfield.gov.uk)>  
Subject: Re: KB-2024-001199 - LBE v Snell and ors  
Importance: High

Dear Mr Kaur,

BK1/ 1

**From:** Balbinder Kaur  
**To:** [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)  
**Subject:** KB-2024-001199 - LBE v Snell and ors  
**Date:** 16 August 2024 08:29:00  
**Attachments:** [18. King's Bench Associate's-Order KB-2024-001199 - LBE v Snell & ors 12.06.24.pdf](#)  
[image001.png](#)  
[ewhc kb 2024 2064 - Judgement Duncan Atkinson KC 12.6.24 \(dated 5.8.24\).pdf](#)  
[Statement of Service MF1 24.6.24.pdf](#)  
[Witness Statement of Service - FMC2- on D1,D2, D4, D5 and D6 Order 12.6.24.pdf](#)  
**Importance:** High

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Dear Sirs

Further to my email of 30 June 2024 and the order of Mr Duncan Atkinson KC of 12 June 2024, we have now received the sealed judgement of the hearing of 12 June 2024 and attach the same herewith along with the documents outlined at paragraph 8 of the Order as follows (previously provided).

1. The application notice
2. The claim form
3. Witness Statements and evidence in support of the application
4. All the orders
5. Judgments
6. Order of Mr Duncan Atkinson KC dated 12.06.2024
7. Sealed Judgement of Mr Duncan Atkinson KC of 12.06.2024 (dated 05.08.2024)
8. Witness Statement of Service of Order of Mr Duncan Atkinson KC dated 26.6.24
9. Witness Statement of Service of Mark Freeman dated 24 June 2024

Please note items 1-5 will follow separately as Bundle Per order of 12 June 2024 as Part 1 and Part 2 due to their size.

Please acknowledge safe receipt.

Kind Regards

Balbinder Kaur  
Assistant Principal Lawyer  
Legal Services, Enfield Council  
Silver Street  
Enfield EN1 3XA

Telephone: 020 8132 0091

Fax: 020 8379 6492

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BK1/ 2

**From:** Balbinder Kaur  
**To:** [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)  
**Subject:** RE: KB-2024-001199 - LBE v Snell and ors  
**Date:** 16 August 2024 08:31:00  
**Attachments:** [Bundle per Order 12 June 2024 Part1.pdf](#)  
[image001.png](#)  
**Importance:** High

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Dears Sirs

Please now find attached Bundle Per order of 12 June 2024 Part 1.

Please acknowledge safe receipt.

Kind Regards

Balbinder Kaur  
Assistant Principal Lawyer  
Legal Services, Enfield Council  
Silver Street  
Enfield EN1 3XA

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Fax: 020 8379 6492

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**From:** Balbinder Kaur

BK1/ 3



**From:** [Balbinder Kaur](#)  
**To:** [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)  
**Subject:** RE: KB-2024-001199 - LBE v Snell and ors  
**Date:** 16 August 2024 08:39:00  
**Attachments:** [image001.png](#)  
[Bundle per Order 12 June 2024 Part2\(1\).pdf](#)  
**Importance:** High

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Dears Sirs

Please now find attached Bundle Per order of 12 June 2024 Part 2(1).

Please acknowledge safe receipt.

Kind Regards

Balbinder Kaur  
Assistant Principal Lawyer  
Legal Services, Enfield Council  
Silver Street  
Enfield EN1 3XA

Telephone: 020 8132 0091

Fax: 020 8379 6492

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**From:** Balbinder Kaur

BK1/ 4



**From:** [Balbinder Kaur](#)  
**To:** [secretariat@bargee-traveller.org.uk](mailto:secretariat@bargee-traveller.org.uk)  
**Subject:** RE: KB-2024-001199 - LBE v Snell and ors  
**Date:** 16 August 2024 08:41:00  
**Attachments:** [Bundle per Order 12 June 2024 Part2\(2\).pdf](#)  
[image001.png](#)  
**Importance:** High

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Dears Sirs

Please now find attached Bundle Per order of 12 June 2024 Part 2(2).

Please acknowledge safe receipt.

Kind Regards

Balbinder Kaur  
Assistant Principal Lawyer  
Legal Services, Enfield Council  
Silver Street  
Enfield EN1 3XA

Telephone: 020 8132 0091

Fax: 020 8379 6492

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BK1/5