



CLAIM NO. PT-2018-000372 10 Aug 2018

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
PROPERTY, TRUSTS AND PROBATE LIST (ChD)

MR JUSTICE CARR
10 AUGUST 2018

PT-2018-000372

BETWEEN:

MERLIN ENTERTAINMENTS PLC AND OTHERS LISTED AT SCHEDULE 1 TO THE
CLAIM FORM

CLAIMANTS

- and -

- (1) ALISTAIR LAW
- (2) RIKKE BREWER
- (3) SCOTT MACKAY

- (4) PERSONS UNKNOWN WHO ENTERED LEGOLAND WINDSOR WITH THE FIRST,
SECOND AND THIRD DEFENDANTS ON 26 APRIL 2018
- (5) PERSON UNKNOWN WHO ENTERED ALTON TOWERS RESORT WITH THE
FIRST, SECOND AND THIRD DEFENDANTS ON 5 MAY 2018
- (6) PERSONS UNKNOWN ENTERING THE CLAIMANTS' PREMISES LISTED IN
SCHEDULE 1 TO THIS ORDER WITHOUT PERMISSION

DEFENDANTS

ORDER

PENAL NOTICE

IF YOU, ALISTAIR LAW, RIKKE BREWER, SCOTT MACKAY OR ANY PERSON
DESCRIBED ON THE FIRST PAGE OF THIS ORDER NEXT TO THE NUMBERS (4),
(5) OR (6) DO NOT COMPLY WITH THIS ORDER YOU MAY BE HELD IN CONTEMPT
OF COURT AND IMPRISONED OR FINED, OR YOUR ASSETS MAY BE SEIZED

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING
WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS
ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE
IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

UPON the Claimants' application by notice dated 19 July 2018 for default judgment.

AND UPON reading the evidence listed in Schedule 2 to this Order

IT IS ORDERED that:

1. The First, Second, Third, Fourth and Fifth Defendants must not enter the premises listed in Schedule 1 at any time and for any purpose without the express written permission of the Claimant referred to in the 'Control' column of the Schedule.
2. The Sixth Defendants must not enter the premises listed in Schedule 1 and located in England or Wales at any time and for any purpose without the express written permission of the Claimant referred to in the 'Control' column of the Schedule.
3. This Order shall be served by 17 August 2018 as follows:
 - a. on the First, Second and Third Defendants, by first class post or by sending it by e-mail to the applicable addresses listed at Schedule 3 to this Order;
 - b. on the Fourth Defendants by serving two additional copies of the Order on any of the First, Second or Third Defendants at the same time, marked for the attention of "*persons unknown who entered LEGOLAND Windsor Resort with Alistair Law, Rikke Brewer and/or Scott Mackay on 26 April 2018*";
 - c. on the Fifth Defendant by serving an additional copy of the Order on any of the First, Second or Third Defendants at the same time, marked for the attention of "*person unknown who entered Alton Towers Resort with Alistair Law, Rikke Brewer and/or Scott Mackay on 5 May 2018*"; and
 - d. on the Sixth Defendants by:
 - i. affixing at each of the premises in England and Wales listed in Schedule 1 a notice that an injunction has been granted preventing certain individuals from entering the

premises, accompanied by a transparent envelope containing copies of this Order; and

- ii. the prominent display on the website <http://www.merlinentertainments.biz/> (or on each attractions' website) of a notice stating that an injunction has been granted preventing certain individuals from entering the premises, with a link to a page where a copy of this Order may be viewed.

4. The Claimants' solicitors must file certificates of service within 7 days after services has been effected in accordance with paragraphs 3.a. to 3.d.

OTHER MATTERS

5. The First, Second and Third Defendants must jointly and severally pay the Claimants' costs of the action, including this application, summarily assessed in the sum of £10,000 by 5pm on 24 August 2018.
6. The Claimants are released from the cross-undertakings given in connection with the order made on 25 May 2018.
7. It is a contempt of court for any person notified of this order to knowingly assist in or permit a breach of this order. Any person doing so may be imprisoned, fined or have their assets seized.
8. A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instruction or with his encouragement.
9. Because the Court has dealt with the Claimants' application for default judgment without a hearing, any party affected by this Order may apply to have it set aside, varied or stayed. Any such application must be made within 7 days of the order coming to their attention. Any person making such an application must give the Claimants' solicitors 48 hours' written notice of the application using the address and reference given at the foot of the order.

10. Without prejudice to the generality of paragraph 9 above anyone falling within the description of the Sixth Defendant on the first page of this order will be at liberty to apply to set aside or vary this order so far as it concerns them. Any application to set aside or vary this order must be made within 14 days of service of the order coming to their attention. Any person making such an application must give the Claimants' solicitors 48 hours' written notice of the application using the address and reference given at the foot of the order.

COMMUNICATION WITH THE COURT

All communications to the Court about this order should be sent to:

Chancery Division
Rolls Building
7 Rolls Building
Fetter Lane
London
EC4A 1NL

NAME AND ADDRESS OF CLAIMANTS' LEGAL REPRESENTATIVES

DLA Piper UK LLP
Victoria Square House
Victoria Square
Birmingham
B2 4DL
Ref: NDB/JWRC/161009-41

The Court has provided a sealed copy of this order to the serving party:

DLA Piper UK LLP

SCHEDULE 1

Site Name	Site Address	Control (Company name, registration number and address)
Sea Life Centre Oban (Sanctuary)	Barcladine, Connell, Oban, Argyll, PA37 1SE	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Weymouth	Lodmoor Country Park, Weymouth, Dorset, DT4 7SX	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Blackpool	The Promenade, Blackpool, Lancashire, FY1 5AA	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Brighton	Marine Parade, Brighton, West Sussex, BN2 1TB	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Scarborough	Scalby Mills, Scarborough, North Yorkshire, YO12 6RP	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
London Dungeon	The London Dungeon, County Hall, Westminster Bridge Road, London, SE1 7PB	Merlin Entertainments (Dungeons) Limited (3671067) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
York Dungeon	12 Clifford Street, York, Y01 9RD	Merlin Entertainments (Dungeons) Limited (3671067) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Gweek (Sanctuary)	Cornish Seal Sanctuary, Gweek, Cornwall, TR12 6UG	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Scheveningen	Stranweg 13, 2586 JK Den Haag, Scheveningen, Holland	SEA LIFE Centre Scheveningen B.V. (27141962) Rokin 78, 1012 KW Amsterdam, Netherlands

Site Name	Site Address	Control (Company name, registration number and address)
Sea Life Centre Great Yarmouth	Marine Parade, Great Yarmouth, Norfolk, NR30 3AH	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Hunstanton (Sanctuary)	Southern Promenade, Hunstanton, Norfolk, PE36 5BH	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Blankenberge	Kronig Albert 1 Laan 116 8370, Blankenberge, Belgium	SEA LIFE Centre Belgium N.V. (452786694) Koning Albert 1 Laan 116, 8370, Blankenberge, Belgium
Sea Life Centre Benalmadena	Puerto Marina, Benalmadena, Malaga 29630, Spain	SLCS SEA LIFE Centre Spain S.A. (A/29/680 360) Puerto Marina, Benalmadena-Costa, 29630 Benalmadena, Malaga, Spain
Sea Life Centre Birmingham	The Waters Edge, Brindley Place, Birmingham, B1 2HL	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Timmendorfer Strand	Niederlassung Timmendorfer Strand, Kurpromenade 5, 23669 Timmendorfer Strand, Germany	SEA LIFE Deutschland GmbH (HRB 93040) Cremon 11, 20457 Hamburg, Germany
Sea Life Centre Bray	Strand Road, Bray, County Wicklow, Ireland	SEA LIFE Centre Bray Limited (279606) First Floor, Fitzwilton House, Wilton Place, Dublin 2, Ireland
Sea Life Centre Konstanz	Klein Venedig, Hafenstrasse 9, 78462 Konstanz, Germany	SEA LIFE Konstanz GmbH (HRB 381600) Klein Venedig, Hafenstrasse 9, 78462 Konstanz, Germany
Hamburg Dungeon	Kehrwieder 2, 20457 Hamburg, Germany	Dungeons Deutschland GmbH (HRB 72306) Cremon 11, 20457 Hamburg, Germany

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Edinburgh Dungeon	31 Market Street, Edinburgh, Scotland, EH1 1QB	Merlin Entertainments (Dungeons) Limited (3671067) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Paris	Centre Commercial Val D'Europe, Espace4 502, 14 Cours De Danube- Serris, 77711 Marne La Vallee Cedex 4, Paris, France	SEA LIFE France SARL (428684690) Centre Commercial Val d'Europe, Espace 502, 14 Cours du Danube, Serris, 7711 Marne-La-Vallée, France
Sea Life Centre Helsinki	Tivolitie 10, 00510 Helsinki, Finland	SEA LIFE Helsinki Oy (1723485-8) Tivolitie 10, Helsinki 00510, Finland
Sea Life Centre Speyer	Niederlassung Speyer, Im Hafengebcken 5, 67346 Speyer, Germany	SEA LIFE Deutschland GmbH (HRB 93040) Cremon 11, 20457 Hamburg, Germany
Sea Life Centre Berlin	Niederlassung Berlin, Spandauer Str 3, 10178 Berlin, Germany	SEA LIFE Deutschland GmbH (HRB 93040) Cremon 11, 20457 Hamburg, Germany
Sea Life Centre Oberhausen	Niederlassung Oberhausen, Zum Aquarium 1, 46047 Oberhausen, Germany	SEA LIFE Deutschland GmbH (HRB 93040) Cremon 11, 20457 Hamburg, Germany
LEGOLAND Billund Park	Nordmarksvej 9, 7190 Billund, Denmark	LEGOLAND ApS (36887613) Aastvej 10, 7190 Billund, Denmark
LEGOLAND California Park	One Legoland Drive, Carlsbad, California 92008, USA	LEGOLAND California LLC (3691253) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Deutschland Park	Legoland Allee, 89312 Guenzburg, Germany	LEGOLAND Deutschland Freizeitpark GmbH (HRB 12706) Legoland Allee, 89312, Gunzburg, Germany

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LEGOLAND Windsor Park	Winkfield Road, Windsor, Surrey, SL4 4AY	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Amsterdam Dungeon	Rokin 78, Amsterdam 1012 KW, Netherlands	Amsterdam Dungeon B.V (34225141) Fred. Roeskestraat 123, 1076 EE Amsterdam, Netherlands
Sea Life Centre Konigswinter	Niederlassung Konigswinter, Rheinallee 8, 53639 Konigswinter, Germany	SEA LIFE Deutschland GmbH HRB (93040) Cremon 11, 20457 Hamburg, Germany
Sea Life Centre Munich	Niederlassung Munchen, Olympia Park, Willi Daume Platz 1, 80809 Munich, Germany	SEA LIFE Deutschland GmbH HRB (93040) Cremon 11, 20457 Hamburg, Germany
Sea Life Centre Loch Lomond	Ben Loch Lomond Way Ballach, Loch Lomond, G83 8QL	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Gardaland Park	Via Derna 4, 37014 Castelnuovo de Garda (VR), Italy	Gardaland Srl (5431170967) Via Derna 4, Castelnuovo del Garda, 37014, Verona, Italy
Sea Life Centre Hannover	Niederlassung Hannover, Herrnehauster Str 4a, 30419 Hannover, Germany	SEA LIFE Deutschland GmbH (HRB 93040) Cremon 11, 20457 Hamburg, Germany
LEGOLAND Discovery Centre Berlin	Sony Centre, Potsdamer str 4, 10785 Berlin, Germany	LEGOLAND Discovery Centre Deutschland GmbH (HRB 99368) Cremon 11, 20457 Hamburg, Germany
Alton Towers Park	Alton Towers Resort Alton Staffordshire, ST10 4DB	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom

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Chessington Park	Leatherhead Road, Chessington, Surrey, KT9 2NE	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Heide Park	Heide Park 1, 29614 Soltau, Germany	Heide-Park Soltau GmbH (HRB 101295) Heidenhof 1, 29614 Soltau, Germany
London Eye	Riverside Building, County Hall, Westminster Bridge Road, London, SE1 7PB	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Madame Tussauds Amsterdam	P&C Gebouw, Dam 20 1012 NP, Amsterdam, Netherlands	Madame Tussauds Amsterdam B.V (33126769) Dam 20 GEBOUW P&C, 1012 NP Amsterdam, Netherlands
Madame Tussauds Hong Kong	Shop P101 The Peak Tower, 128 peak Road, The Peak, Hong Kong	Madame Tussauds Touring Exhibition Limited (3844617) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Madame Tussauds Las Vegas	3377 Las Vegas Boulevard South, Suite 2001, Las Vegas	Madame Tussauds Las Vegas LLC (2842540) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Madame Tussauds London	Marylebone Road, London, NW1 5LR	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Madame Tussauds New York	234 West 42nd Street, New York, NY 10036 USA	Madame Tussaud's New York LLC (3059402) 80 State Street, Albany, New York 12207-2543, United States
Madame Tussauds Shanghai	10/F New World Building, No2-68 Najing Xi Road, Shanghai 200003, China	Madame Tussauds Exhibition (Shanghai) Company Ltd (310000400444488) 10/F New World Building, No 2-68 Nanjing Xi Road, Shanghai 200003, China

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Thorpe Park	Staines Road, Chertsey, Surrey, KT16 8PN	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Warwick Castle	Warwick, Warwickshire, CV34 4QU	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Madame Tussauds Washington	100 F Street NW, Washington DC 20004, USA	Madam Tussauds Washington LLC (4123353) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre London	The County Hall, Riverside Building, London, SE1 7PB	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Gardaland	Via Derna 4, 37014 Castelnuovo de Garda (VR), Italy	Gardaland Srl (5431170967) Via Derna 4, Castelnuovo del Garda, 37014, Verona, Italy
Madame Tussauds Berlin	Niederlassung Berlin, Under den Linden 74, 10117 Berlin	Madame Tussauds Deutschland GmbH (HRB 103588) Cremon 11, 20457 Hamburg, Germany
LEGOLAND Discovery Centre Chicago	601 N. Martingale Road, Unit 130, Schaumburg, Illinois, 60174=3 USA	LEGOLAND Discovery Centre US LLC (4400879) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre California	One Legoland Drive, Carlsbad, California 92008, USA	SEA LIFE US LLC (4604488) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre Minnesota	120 East Broadway, Bloomington, Minnesota 55425, USA	SEA LIFE Minnesota LLC (4604476) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States

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Sea Life Centre Porto	1a Rue Particular do Castelo de Queijo, 4100- 379 Poro, Portugal	Merlin Entertainments (SEA LIFE PORTO) Unipessoal Lda (508 592 925) Avenida Da Boavista 3265, 7th Floor, 4100–137 Porto, Portugal
Madame Tussauds Hollywood	6933 Hollywood Boulevard, Hollywood CA 90028, USA	Madame Tussauds Hollywood LLC (4195093) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Warwick Castle Dungeon	Warwick, Warwickshire, CV34 4QU	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND Discovery Centre Manchester	Unit 5, Barton Square, The Trafford Centre, Manchester, M17 8AS	Merlin Entertainments Group Operations Limited (3671093) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Arizona	5000 S, Arizona Mills Circle Ste, 145 tempe, AZ 85282. USA	SEA LIFE US LLC (4604488) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Blackpool Tower Eye	The Promenade, Blackpool, Lancashire, FY1 4BJ	Merlin Entertainments (Blackpool) Limited (2429776) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Madame Tussauds Bangkok	989 Siam Discovery Unit 401-407, 4th-7th Floor, Rama 1 Road, Pathumwan, Bangkok 10330, Thailand	Merlin Entertainments (Thailand) Limited (105552109057) 989 Siam Discovery Center 6, 6A, 7 and 8th Floors, Rama I Road, Kwaeng Pathumwan, Khet Pathumwan, Bangkok 10330, Thailand
Sea Life Centre Sydney	1-5 Wheat Road, Darling Harbour, Sydney, NSW 2000, Australia	Sydney Wildlife World Pty. Limited (119 877 486) Level 16, 201 Elizabeth Street, Sydney, NSW, 2000, Australia
WILD LIFE Sydney	1-5 Wheat Road, Darling Harbour, Sydney, NSW 2000, Australia	Sydney Wildlife World Pty. Limited (119 877 486) Level 16, 201 Elizabeth Street, Sydney, NSW, 2000, Australia

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Manly SEA LIFE Sanctuary	West Esplanade, Manly NSW 2095, Australia	Sydney Attractions Group Pty Ltd (008 632 764) Level 16, 201 Elizabeth Street, Sydney, NSW, 2000, Australia
WILD LIFE Hamilton Island	PO Box 46, Hamilton Island, QLD 4803, Australia	AQDEV Pty Limited (003 688 846) Level 16, 201 Elizabeth Street, Sydney, NSW, 2000, Australia
Sydney Tower Eye	Sydney Tower and Skywalk, Podium Level, 100 Market Street, Sydney, NSW 2000, Australia	Sydney Tower Observatory Pty Limited (103232748) Level 16, 201 Elizabeth Street, Sydney, NSW, 2000, Australia
Kelly Tarlton's SEA LIFE Aquarium	23 Tamaki Drive, Orekeo, Auckland 1071, New Zealand	Auckland Aquarium Limited (2109860) Level 12, 55 Shortland Street, Auckland 1010, New Zealand
Sea Life Centre Jesolo	Via Derna 4, 37014 Castelnuovo de Garda (VR), Italy	Merlin Attractions Italy Srl (3822120238) Via Derna 4, Castelnuovo del Garda, 37014, Verona, Italy
LEGOLAND Discovery Centre Dallas	Grapevine Mills Mall, 3000 Grapevine Mills Parkway Suite 519, Grapevine, Texas 76051 USA	LEGOLAND Discovery Centre (Dallas) LLC (4745968) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Madame Tussauds Vienna	Riesenradplatz 5-6, 1020 Vienna, Austria	Madame Tussauds Austria GmbH (FN342941a) Riesenradplatz 5-6, 1020 Wien, Vienna, Austria
Madame Tussauds Blackpool	85-89 Promenade, Blackpool, Lancashire, FY1 5AA	Merlin Entertainments (Blackpool) Limited (2429776) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Sea Life Centre Dallas	Grapevine Mills Mall, 3000 Grapevine Mills Parkway Suite 519, Grapevine, Texas 76051 USA	SEA LIFE US LLC (4604488) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States

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Blackpool Dungeon	The Promenade, Blackpool, Lancashire, FY1 4BJ	Merlin Entertainments (Blackpool) Limited (2429776) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND Florida	1 Legoland Way, Winter Haven, FL 33884, USA	Merlin Entertainments Group Florida LLC (4605909) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Melbourne SEA LIFE Aquarium	PO Box 479, Collins Street West, Victoria 807, Australia	Melbourne Underwater World Pty Ltd (070 549 236) Level 11, 50 Queen Street, Melbourne, VIC, 3000, Australia
Underwater World SEA LIFE Mooloolaba	PO Box 511, Mooloolaba, QLD 4557, Australia	Underwater World Sunshine Coast Pty Ltd (089 366 772) Level 11, 50 Queen Street, Melbourne, VIC, 3000, Australia
SEA LIFE Busan Aquarium	266 (Jungdong), Haeundaehaebyeon-ro, Haeundae-gu 612-846, Busan, Korea	Busan Aquaria Twenty One Co Limited (180111-0551598) 1411-4, Jung 1-dong, Haenudee-Gu, Busan, Republic of Korea
SEA LIFE Bangkok Ocean World	B1-B2 Floor Siam Paragon, 991 Rama 1 Road, Kwaeng Pathumwan, Khet Pathumwan, Bangkok 10330, Thailand	Siam Ocean World Bangkok Co Ltd (105549035463) B1-B2 Floor Siam Paragon, 991 Rama 1 Road, Khweng Patumwan, Bangkok 10330, Thailand
Chang Feng Ocean World (Shanghai)	Beluga Show Stadium, No 839 Zao Yang Road, Shanghai, 2000062, China	Shanghai Chang Feng Ocean World Co Ltd (QIU ZUO HU ZONG ZI 022052) 189, Dadhue Road, Pu Tuo District, Shanghai, 200062, China
Otway Fly (Victoria)	PO Box 634, Colac, Victoria 3250, Australia	The Otway Fly Pty. Ltd. (099 502 833) Level 11, 50 Queen Street, Melbourne, VIC, 3000, Australia
Illawarra Fly (New South Wales)	PO Box 3279, Robertson NSW 2577, Australia	Illawarra Tree Topps Pty Ltd (122 863 361) Level 11, 50 Queen Street, Melbourne, VIC, 3000, Australia

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Hotham Ski Field	PO Box 140, Bright, Victoria 3741, Australia	Mount Hotham Skiing Company Pty Ltd (004 294 697) Level 11, 50 Queen Street, Melbourne, VIC, 3000, Australia
Falls Creek Ski Field	PO Box 55, Falls Creek, Victoria 3699, Australia	Falls Creek Ski Lifts Pty. Ltd. (004 843 761) Level 11, 50 Queen Street, Melbourne, VIC, 3000, Australia
LEGOLAND Discovery Centre Atlanta	3500 Peachtree Road, Suite G-1, Atlanta	LEGOLAND Discovery Centre US LLC (4400879) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre Kansas City	2457 Grand Boulevard, Kansas City, Missouri 64108, USA	SEA LIFE US LLC (4604488) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Madame Tussauds Sydney	Aquarium Pier, 1-5 Wheat Road, Darling Harbour, NS 2000, Australia	Sydney Attractions Group Pty Ltd (008 632 764) Level 16, 201 Elizabeth Street, Sydney, NSW, 2000, Australia
LEGOLAND Discovery Centre Kansas City	2457 Grand Boulevard, Kansas City, Missouri 64108, USA	LEGOLAND Discovery Centre US LLC (4400879) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Discovery Centre Tokyo	Island Mall 6F, Deck Tokyo Beach, 10601 Daiba, Minato-Ku, Tokyo 135-0091, Tokyo	Merlin Entertainments (Japan) Limited (0100-01-140059) Island Mall, Decks Tokyo Beach, 1-6-1 Daiba, Minato-ku, Tokyo, Japan
Jurassic Skyline	The Quay, Weymouth, Dorset, DT4 8DX	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND Malaysia	No 7 Jalan Legoland, Bandar Medini Iskander Malaysia, Iskander Puteri 79250, Johor, Malaysia	Merlin Entertainments Group (Malaysia) Sdn Bhd (837160-W) No. 7, Jalan LEGOLAND, Bandar Medini Iskandar Malaysia, 79250 Iskandar Puteri, Johor, Malaysia

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LEGOLAND Discovery Centre Toronto	1 Bass Pro Mills Drive, Vaughan, Toronto, Ontario, ON LK4 5W4 Canada	Merlin Entertainments (Canada) Inc (807961-7) Suite 5300 Commerce Court West, 199 Bay Street, Toronto, ON, M5L 1B9, Canada
LEGOLAND Discovery Centre Oberhausen	Promenade 10, 46047 Oberhausen, Germany	Legoland Discovery Centre Deutschland GmbH (HRB 99368) Cremon 11, 20457 Hamburg, Germany
Berlin Dungeon	Spandauer Strasse 2, 10117 Berlin, Germany	Dungeons Deutschland GmbH (HRB 72306) Cremon 11, 20457 Hamburg, Germany
Madame Tussauds Tokyo	Island Mall 6F, Deck Tokyo Beach, 10601 Daiba, Minato-Ku, Tokyo 135-0091, Tokyo	Merlin Entertainments (Japan) Limited (0100-01-140059) Island Mall, Decks Tokyo Beach, 1-6-1 Daiba, Minato-ku, Tokyo, Japan
LEGOLAND Discovery Centre Westchester	39 Fitzgerald Street, Yonkers, NY 10710, USA	LEGOLAND Discovery Centre US LLC (4400879) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre Manchester	Unit 5, Barton Square, The Trafford Centre, Manchester, M17 8AS	Merlin Entertainments (SEA LIFE) Limited (2182098) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Istanbul SEA LIFE Aquarium	Istanbul Sualti, Dunyasi Turizm Tic A.S, Forum Istanbul, No 3 Kocatepe Mah, Pasa Cad 34045, Bayrampasa, Istanbul	Istanbul Sualti Dunyasi Turizm Ticaret Anonim Sirketi (665114/0) Kocatepe Mah, Pasa Cad, Forum Istanbul AVM No. 5/5, Bayrampasa, Turkey
Madame Tussauds Wuhan	21 Han Street, 430000 Wuhan	Madame Tussauds Exhibition (Wuhan) Company Limited (420100400017333) 21, Han Street, Wuchang District, (Shops 40/41/42) Building 5, Lot J2, Wuhan, China

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Sea Life Centre Charlotte	Concord Mills, 8111 Concord Mills Boulevard, Suite 846, Concord Mills, NC 28027 N Carolina, USA	SEA LIFE Charlotte LLC (5284553) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Discovery Centre Boston	598 Assembly Row, Somerville, MA 02145, USA	LEGOLAND Discovery Centre Boston LLC (5345489) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Madame Tussauds Beijing	No 8, Qianmen Street, Dongcheng District, Beijing, China 100050	Madame Tussauds Exhibition (Beijing) Company Limited (110000450252715) No. 4, 6, 8, 10, 12, 14, 16, 18 Qianmen Avenue, Dongcheng District, Beijing, China
Madame Tussauds San Francisco	145 Jefferson Street, San Francisco, CA 94133, USA	Madame Tussauds San Francisco LLC (5296542) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
San Francisco Dungeon	145 Jefferson Street, San Francisco, CA 94133, USA	San Francisco Dungeon LLC (5303822) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Madame Tussauds Singapore	40 Imbiah Road, Sentosa, Singapore 099700	Merlin Entertainments Singapore Pte Ltd (201327636R) 10, Changi Business Park Central 2, #05-01, HansaPoint@CBP, 486030, Singapore
Sea Life Centre Michigan	Great Lakes Crossing, 4316 Baldwin Road, Auburn Hills, MI48326, USA	SEA LIFE Michigan LLC (5439083) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Discovery Centre Osaka	Tempozan Market Place 3F, 1-1-10 Kaigandori, Minato-Ku, Osaka 552- 0022	Merlin Entertainments (Japan) Limited (0100-01-140059) Island Mall, Decks Tokyo Beach, 1-6-1 Daiba, Minato-ku, Tokyo, Japan

Site Name	Site Address	Control (Company name, registration number and address)
Madame Tussauds Orlando	8387 International Drive, Orlando, Florida 32819, USA	Madame Tussauds Orlando LLC (4604492) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre Orlando	Suite 100, 8401 International Drive, Orlando, Florida 32819, USA	SEA LIFE Orlando LLC (5226730) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Shrek's Adventure! London	The County Hall, Riverside Building, London, SE1 7PB	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND Discovery Centre Istanbul	Kocatepe Mah, Pasa Cad, Forum Istanbul, AVM No 5/s, 34045 Bayrampasa, Istanbul, Turkey	Istanbul Sualti Dunyasi Turizm Ticaret Anonim Sirketi (665114/0) Kocatepe Mah, Pasa Cad, Forum Istanbul AVM No. 5/5, Bayrampasa, Turkey
LEGOLAND Discovery Centre Michigan	Great lakes Crossing Outlets, 4240 Baldwin Road, Auburn Hills, MI 48326, USA	LEGOLAND Discovery Centre Michigan LLC (5648537) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Discovery Centre Shanghai	L2, Nlo 196 Daduhe Road, Putuo District, Shanghai, China	Merlin Indoor Children's Playground (Shanghai) Company Limited (91310000MA1FL0AC9P) L2-25, 2F, 3F Parkside Plaza, Putuo District, Shanghai, China
LEGOLAND Discovery Centre Arizona	Temp office - Sea Life Centre Arizona (c/o LEGOLAND Discovery Centre), 5000 S. Arizona Mills Circle, Ste 145 Tempe AZ 85282, USA	LEGOLAND Discovery Centre Arizona LLC (5648534) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States

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Madame Tussauds Chongqing	No 133 NanBin Road, Nan'an District, Chongqing 400060, China	Merlin Exhibition (Chongqing) Company Limited (91500108MA5U35GX59) 4-11, Fu 9, No. 133, NanBin Road, Nan'an District, Chongqing, China
LEGOLAND Dubai	PO Box 12311, Dubai, UAE	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Madame Tussauds Istanbul	Kocatepe Mah, Pasa Cad, Forum Istanbul, AVM No 5/s, 34045 Bayrampasa, Istanbul, Turkey	Istanbul Sualti Dunyasi Turizm Ticaret Anonim Sirketi (665114/0) Kocatepe Mah, Pasa Cad, Forum Istanbul AVM No. 5/5, Bayrampasa, Turkey
LEGOLAND Japan	2-2-1 Kinjofutou, Minato-Ku, Nagoya-City, Japan 455-8605	LEGOLAND Japan Limited (0100 01 154148) 2-2-1, Kinjofutou Minato-ku, Nagoya-shi, Japan
LEGOLAND Discovery Centre Philadelphia	Plymouth Meeting Mall, 500 W Germantown Pike, Plymouth Meeting, PA 19462, USA	LEGOLAND Discovery Centre Philadelphia LLC (5880171) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Madame Tussauds Nashville	515 Opry Mills Drive, Nashville, TN 37214, USA	Madame Tussauds Nashville LLC (5977436) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Discovery Centre Melbourne	Chadstone Shopping Centre, Level 2 Entertainment Zone, 1341 Dandenong Road, Chadstone, Victoria 3148, Australia	Legoland Discovery Centre Melbourne Pty Ltd (601 100 869) Level 16, 201 Elizabeth Street, Sydney, NSW, 2000, Australia

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Sea Life Centre Chongqing	No 57 Taichang Road, Nan'an District, Chongqing 400061, China	Merlin Exhibition (Chongqing) Company Limited, SEA LIFE Branch (91500108MA5U35GX59) 4-11, Fu 9, No. 133, Nanpin Road, Nan'an District, Chongqing, China
Little Big City Berlin	WeWork Potsdamer Platz, Kemperpl 1, 10785 Berlin	Dungeons Deutschland GmbH (HRB 72306) Cremon 11, 20457 Hamburg, Germany
LEGOLAND Billund Hotel	Nordmarksvej 9, 7190 Billund, Denmark	LEGOLAND Aps (36887613) Aastvej 10, 7190 Billund, Denmark
Gardaland Hotel	Via Derna 4, 37014 Castelnuovo de Garda (VR), Italy	Gardaland Srl (5431170967) Via Derna 4, Castelnuovo del Garda, 37014, Verona, Italy
Alton Splash Landings Hotel	Staffordshire, ST10 4DB	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Alton Towers Hotel	Staffordshire, ST10 4DB	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Heide Hotel	Heide Park 1, 29614 Soltau, Germany	Tussauds Heide Metropole GmbH (HRB 101281) Heidenhof 1, 29614 Soltau, Germany
Chessington Safari Hotel	Leatherhead Road, Chessington, Surrey, KT9 2NE	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND Windsor Hotel	Winkfield Road, Windsor, Surrey, SL4 4AY	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom

Site Name	Site Address	Control (Company name, registration number and address)
LEGOLAND California Hotel	One Legoland Drive, Carlsbad, California 92008, USA	LEGOLAND California LLC (3691253) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Malaysia Hotel	No 7 Jalan Legoland, Bandar Medini Iskander Malaysia, Iskander Puteri 79250, Johor, Malaysia	LEGOLAND Malaysia Hotel Sdn Bhd (973671-M) Suite 2-4, Level 2, Tower Block, Menara Milenium, Jalan Damanlela, Pusat Bandar Damansara, 50490 Kuala Lumpur, Malaysia
THORPE SHARK Hotel	Staines Road, Chertsey, Surrey, KT16 8PN	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Chessington Azteca Hotel	Leatherhead Road, Chessington, Surrey, KT9 2NE	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND Florida Hotel	1 Legoland Way, Winter Haven FL 33884, USA	Merlin Entertainments Group Florida LLC (4605909) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Gardaland Adventure Hotel	Via Derna 4, 37014 Castelnuovo de Garda (VR), Italy	Gardaland Srl (5431170967) Via Derna 4, Castelnuovo del Garda, 37014, Verona, Italy
LEGOLAND Windsor Castle Hotel	Winkfield Road, Windsor, Surrey, SL4 4AY	Merlin Attractions Operations Limited m(6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Alton Towers CBeebies Land Hotel	Staffordshire, ST10 4DB	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Heide Camp	Heide Park 1, 29614 Soltau, Germany	Heide Park Soltau GmbH (HRB 101295) Heidenhof 1, 29614 Soltau, Germany

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LEGOLAND Deutschland Holiday Village	Legoland Allee, 89312 Gunzburg, Germany	LEGOLAND Deutschland Freizeitpark GmbH (HRB 12706) Legoland Allee, 89312, Gunzburg, Germany
LEGOLAND Billund Holiday Village	Nordmarksvej 9, 7190 Billund, Denmark	LEGOLAND ApS (36887613) Aastvej 10, 7190 Billund, Denmark
Alton Towers Enchanted Village	Staffordshire, ST10 4DB	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
Warwick Castle Knight's Village	Warwick, Warwickshire, CV34 4QU	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND Florida Beach Retreat	100 Legoland Way, Winter Haven 33884	Merlin Entertainments Group Florida LLC (4605909) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre Rome	Piazza Umberto Elia Terracini, Laghetto del'Eur, 144, Rome	Merlin Attractions Italy Srl (3822120238) Via Derna 4, Castelnuovo del Garda, 37014, Verona, Italy
LEGOLAND Korea	8F Moolim B/D, Jungang-ro 16, Chuncheon-si, Gangwon-do, Republic of Korea	LEGOLAND Korea LLC (180114-0010902) Yoseon-dong, 8F Moorim Building, 16 Jungang-ro, Chuncheon- si, Gangwon-do, Republic of Korea
Sea Life Centre American Dream	American Dream Mall, Meadowlands, 300 Paterson Plank Rd, East Rutherford, NJ 07073	SEA LIFE Meadowlands LLC (91500108MA5U35GX59) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Discovery Centre American Dream	American Dream Mall, Meadowlands, 300 Paterson Plank Rd, East Rutherford, NJ 07073	LEGOLAND Discovery Centre (Meadowlands) LLC (4499911) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States

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Madame Tussauds New Delhi	44 Regal Building, Connaught Place, Central Delhi DL 110001, India	Merlin Entertainments India Private Limited (U92400DL2015FTC286047) 44, Regal Building, Connaught Place, New Delhi, Central Delhi DL, 110001, India
LEGOLAND Japan Hotel	2-2-1 Kinjoutou, Minato-Ku, Nagoya-City, Japan 455-8605	LEGOLAND Japan Limited (0100 01 154148) 2-2-1, Kinjoutou Minato-ku, Nagoya-shi, Japan
LEGOLAND Discovery Centre Shenyang	Shenyang Art Mall, 418 Qingnian Avenue, Heping District, Shenyang.	Merlin Exhibition (Shenyang) Company Limited (91310000MA1FL0AC9P) No. 2 Jia-1, Bolan Road, Heping District, Shenyang, China
Sea Life Centre Shenyang	Shenyang Art Mall, 418 Qingnian Avenue, Heping District, Shenyang.	Merlin Exhibition (Shenyang) Company Limited (91310000MA1FL0AC9P) No. 2 Jia-1, Bolan Road, Heping District, Shenyang, China
Madame Tussauds Dubai	PO Box 12311, Dubai, UAE	Madame Tussauds Museum LLC (765159) Office 1601, 48 Burj Gate, Burj Khalifa, Dubai, United Arab Emirates
Sea Life Centre Japan	2-2-1 Kinjoutou, Minato-Ku, Nagoya-City, Japan 455-8605	Merlin Entertainments (Japan) Limited (0100-01-140059) Island Mall, Decks Tokyo Beach, 1-6-1 Daiba, Minato-ku, Tokyo, Japan
LEGOLAND Discovery Centre San Antonio	849 E. Commerce St, San Antonio, TX 78205	LEGOLAND Discovery Center San Antonio LLC (6279215) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
Sea Life Centre San Antonio	849 E. Commerce St, San Antonio, TX 78205	SEA LIFE Center San Antonio LLC (6279211) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Discovery Centre Birmingham	Arena Birmingham, King Edwards Rd, Birmingham, B1 2AA	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom

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Shanghai Dungeon	Mosaic Shanghai Shopping Mall, 353 Nanjing East Road, Huang Pu, District, Shanghai.	Merlin Indoor Children's Playground (Shanghai) Company Limited, Huangpu Branch (91310000MA1FL0AC9P) L2-25, 2F, 3F Parkside Plaza, Putuo District, Shanghai, China
LEGOLAND Discovery Centre Columbus	160 Easton Town Centre, Columbus, OH 43219, USA	LEGOLAND Discovery Center Columbus LLC (6501386) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
The Bear Grylls Adventure - Birmingham	Pavilion 1 and 2, The National Exhibition Centre, Birmingham B40 1NT.	Merlin Attractions Operations Limited (6272935) Link House, 25 West Street, Poole, Dorset, BH15 1LD, United Kingdom
LEGOLAND New York	Harriman Drive, Goshen, NY 10924.	LEGOLAND New York LLC (6542161) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND California Castle Hotel	One Legoland Drive, Carlsbad, California 92008, USA	LEGOLAND California LLC (3691253) 1209 Orange Street, Wilmington, New Castle County, Delaware, 19801, United States
LEGOLAND Deutschland Pirate Island Hotel	Legoland Allee, 89312 Guenzburg, Germany	LEGOLAND Deutschland Freizeitpark GmbH (HRB 12706) Legoland Allee, 89312, Gunzburg, Germany

SCHEDULE 2

1. Witness Statement of Dominic Wigley dated 15 May 2018
2. Witness Statement of Joseph William Robert Cater dated 24 May 2018
3. Second Witness Statement of Joseph William Robert Cater dated 19 July 2018

SCHEDULE 3

Alistair Law	[REDACTED] Southampton, SO19 [REDACTED] [REDACTED]
Rikke Brewer	[REDACTED] Aldershot, GU12 [REDACTED] [REDACTED] [REDACTED]
Scott Mackay	[REDACTED] Southampton, SO14 [REDACTED]

CLAIM NO PT-2018-00372

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
PROPERTY, TRUSTS AND PROBATE LIST (ChD)

MERLIN ENTERTAINMENTS PLC AND OTHERS LISTED AT SCHEDULE 1 TO
THE CLAIM FORM

CLAIMANTS

- and -

(1) ALISTAIR LAW

(2) RIKKE BREWER

(3) SCOTT MACKAY

(4) PERSONS UNKNOWN WHO ENTERED LEGOLAND WINDSOR WITH THE
FIRST, SECOND AND THIRD DEFENDANTS ON 26 APRIL 2018

(5) PERSON UNKNOWN WHO ENTERED ALTON TOWERS RESORT WITH
THE FIRST, SECOND AND THIRD DEFENDANTS ON MAY 2018

(6) PERSONS UNKNOWN ENTERING THE CLAIMANTS' PREMISES LISTED IN
SCHEDULE 1 TO THIS ORDER WITHOUT PERMISSION

DEFENDANTS

ORDER

DLA Piper UK LLP
Victoria Square
House
Victoria Square
Birmingham
B2 4DL

JWRC/JWRC/161009/41/UKM/9103175
6.1
Solicitors for the Claimants

