

Stephen Leach
Claimant
First witness statement
Exhibit SL2
30 January 2026

Claim No. PT-2025-000853

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

B E T W E E N :

ELECTRIC GLASS FIBER UK, LTD.

Claimant

-and-

**PERSONS UNKNOWN WHO WITHOUT THE PERMISSION OF THE CLAIMANT
ENTER OR REMAIN ON THE LAND REGISTERED AT HM LAND REGISTRY
UNDER TITLE NUMBERS GM459851 AND GM459852 AS MARKED IN RED ON
THE PLAN AT SCHEDULE 1 TO THE CLAIM FORM**

Defendants

EXHIBIT SL2

From: noreply@thomsonreuters.com <noreply@thomsonreuters.com>
Sent: 28 January 2026 15:14
To: Sam Henry
Subject: Filing Submission Case No. PT-2025-000853 Matter No. 12033662.1

HM Courts & Tribunals E-Filing Service

This is a notice to inform you that the filings, confirmation number 1563651769613144476, have been submitted on 28-01-2026 15:12. You can view the filings using the following [link](#).

Sent by Thomson Reuters on behalf of HM Courts & Tribunals Service.
Do not respond to this system-generated e-mail notification.

From: Michael Kane <michael.kane@tgccomputers.co.uk>
Sent: 28 January 2026 16:26
To: Steve Leach; Karl Bolton
Cc: John Shillito
Subject: RE: Urgent: 4PM deadline: upload documents to website [HD-EUR.12033662.1]

<https://negeurope.co.uk/>

The documents are in links at the bottom of the page.

Thanks

Michael Kane
Technical Consultant

TGC Computers Ltd

Tel: 0845 257 8017

Mbl: 07766 074969

e-mail: michael.kane@tgccomputers.co.uk

www: www.TGCComputers.co.uk

Company registration number: 6074223

From: Steve Leach
Sent: 28 January 2026 16:25
To: Michael Kane ; Karl Bolton
Cc: John Shillito
Subject: RE: Urgent: 4PM deadline: upload documents to website [HD-EUR.12033662.1]

Thanks Michael!! Do you have the web page details?

From: Michael Kane <michael.kane@tgccomputers.co.uk>
Sent: 28 January 2026 16:24
To: Karl Bolton <karl.bolton@tgccomputers.co.uk>; Steve Leach <S.Leach@negeurope.com>
Cc: John Shillito <john.shillito@tgccomputers.co.uk>
Subject: RE: Urgent: 4PM deadline: upload documents to website [HD-EUR.12033662.1]

Hi All,

This has now been actioned.

Thanks

Michael Kane
Technical Consultant

TGC Computers Ltd

Tel: 0845 257 8017

Mbl: 07766 074969

e-mail: michael.kane@tgccomputers.co.uk

www: www.TGCComputers.co.uk

Company registration number: 6074223

From: Karl Bolton <karl.bolton@tgccomputers.co.uk>
Sent: 28 January 2026 15:52
To: Steve Leach <S.Leach@negeurope.com>

Cc: Michael Kane <michael.kane@tgccomputers.co.uk>; John Shillito <john.shillito@tgccomputers.co.uk>
Subject: RE: Urgent: 4PM deadline: upload documents to website [HD-EUR.12033662.1]

Hi Steve,

Mike is on with this now for you.
Please find attached quote as requested.

Kind Regards

Karl...

From: Steve Leach <S.Leach@negeurope.com>
Sent: 28 January 2026 15:28
To: Karl Bolton <karl.bolton@tgccomputers.co.uk>
Subject: FW: Urgent: 4PM deadline: upload documents to website [HD-EUR.12033662.1]
Importance: High

From: Sam Henry <Sam.Henry@hildickinson.com>
Sent: 28 January 2026 15:04
To: Steve Leach <S.Leach@negeurope.com>; Olivia Sweeney-Jones <Olivia.Sweeney-Jones@hildickinson.com>
Cc: Masanori Otani <msotani@neg.co.jp>
Subject: Urgent: 4PM deadline: upload documents to website [HD-EUR.12033662.1]
Importance: High

Hi Steve

Thank you for returning the statement.

We now need to deal with serving the documents which must be done by 4pm today.

Please could you upload the attached documents to the injunction website.

- Application Notice
- Draft order
- Signed WS and exhibit (exhibit too large to send – link here - <https://www.imanageshare.co.uk/pd/5phBjO6G12J>)
- And the attached email listing the hearing for 11 February, we will ask for a formal notice of hearing and send to you afterwards.

You do not need to print and post the documents for now.

Please confirm once these have been uploaded.

Kind regards

Sam Henry
Associate
Real Estate Litigation

Hill Dickinson

T: +44 161 817 7336
E: sam.henry@hildickinson.com
[hilldickinson.com](https://www.hilldickinson.com) [LinkedIn](#)

1 St Michael's, 36 Jacksons Row, Manchester, M2 5WD

...with his, her or their encouragement.

2. A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANT AND DEFENDANTS

EFFECT OF THIS ORDER

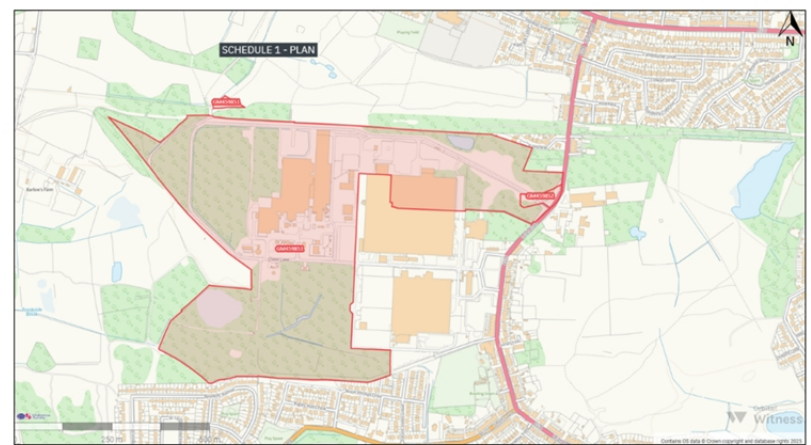
3. It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be sent to prison, fined, or have their assets seized.

INTERPRETATION OF THIS ORDER

4. In this Order, where there is more than one Defendant, unless otherwise stated, references to "the Defendants" means each or all of them.

SCHEDULE 1

The Land (as defined) is shown as shaded and edged in red in the below plan.



- [Certificate of Urgency document](#)
- [N244](#)
- [Sealed Claim Form](#)
- [Sealed Order as amended - Electric Glass Fiber - PT-2025-000853](#)
- [Witness Statement of Stephen Leach _ Exhibit SL1 - 28 January 2026](#)

Claim No. PT-2025-000853
IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
PROPERTY TRUSTS AND PROBATE LIST (ChD)

Before [Judge]
11 February 2026

B E T W E E N :

ELECTRIC GLASS FIBER UK, LTD.
Claimant

-and-

PERSONS UNKNOWN WHO WITHOUT THE PERMISSION OF THE CLAIMANT
ENTER OR REMAIN ON THE LAND REGISTERED AT HM LAND REGISTRY
UNDER TITLE NUMBERS GM459851 AND GM459852 AS MARKED IN RED ON
THE PLAN AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

INJUNCTION ORDER

PENAL NOTICE

IF YOU PERSONS UNKNOWN DISOBEY THIS ORDER OR INSTRUCT OR
ENCOURAGE OTHERS TO DISOBEY THIS ORDER YOU MAY BE HELD TO BE
IN CONTEMPT OF COURT AND YOU MAY BE IMPRISONED, FINED OR HAVE
YOUR ASSETS 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 TO BE IN CONTEMPT OF COURT AND
MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

Important notice to the Defendants: this Order prohibits you from doing the acts set out
in this Order. You should read this Order very carefully. You are advised to consult a
solicitor as soon as possible. You have the right to ask the court to vary or discharge this
Order.

Stephen Leach
Claimant
First witness statement
Exhibit SL1
28 January 2026
Claim No. PT-2025-000853

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

B E T W E E N :

ELECTRIC GLASS FIBER UK, LTD.

Claimant

-and-

**PERSONS UNKNOWN WHO WITHOUT THE PERMISSION OF THE CLAIMANT
ENTER OR REMAIN ON THE LAND REGISTERED AT HM LAND REGISTRY
UNDER TITLE NUMBERS GM459851 AND GM459852 AS MARKED IN RED ON
THE PLAN AT SCHEDULE 1 TO THE CLAIM FORM**

Defendants

FIRST WITNESS STATEMENT OF STEPHEN LEACH

I, **Stephen Leach**, of Leigh Road, Hindley Green, Wigan WN2 4XG will say as follows:

1. I am the Site Manager of the Claimant's site situated at Leigh Road, Hindley Green, Wigan WN2 4XG (and referred to as the 'Site' in this witness statement). I am employed by the Claimant and have worked at the Site for 36 years. I am duly authorised to make this witness statement on behalf of the Claimant.
2. I make this witness statement in support of the Claimant's Application for the continuation of the injunction order dated 19 August 2025 (the '**Injunction**') for a further 12 months. The Injunction is currently due to expire at 23:59hrs on 18 February 2026. This Application is made pursuant to paragraph 6 of the Injunction.
3. This witness statement has been prepared following an exchange of emails and a video conference with the Claimant's legal advisers. The facts and matters set out by me in this witness statement are within my own knowledge unless otherwise stated, and I believe

1010261583.1

or by instructing or encouraging or allowing any other person) are forbidden from:

- a) entering or remaining on the Land;
- b) entering or remaining in or on any building on the Land;
- c) damaging any building, structure, fixture or item on the Land;
- d) removing or attempting to remove any item from the Land.

Service and notification

3. Pursuant to CPR 6.15 and 6.27, and for the purposes of CPR 81.4, the Claimant is permitted to notify the Defendants (Persons Unknown) of the Claim Form, Application Notice, all evidence in support of the Claim and Application, this Order and any further documents in the Claim by the following means (which are to be treated conjunctively, and which are to be taken as having been good and sufficient notification to Persons Unknown on the day on which all of the following steps are completed):

- a) affixing copies (as opposed to originals) of this Order in a transparent envelope in a prominent position at or as close as reasonably practicable to all vehicular and pedestrian entry points to the Land; and
- b) affixing copies (as opposed to originals) of this Order in a transparent envelope in a prominent position at regular intervals around the perimeter of the Land; and
- c) affixing copies (as opposed to originals) of a notice addressed to "Persons Unknown who without the permission of the of the Claimant enter or remain on the land registered at HM Land Registry under title numbers GM459851 and GM459852 as marked in red on the plan at Schedule 1 to the Claim Form" in a transparent envelope in a prominent position at or as close as reasonably practicable to all vehicular and pedestrian entry points to the Land which informs Persons Unknown that a copy of the Claim and all supporting documents can be obtained or inspected at Hill Dickinson LLP, 1 St Michael's, 36 Jackson's Row, Manchester, M2 5WD or via a website link provided in the notice; and
- d) affixing copies (as opposed to originals) of the aforementioned notice to Persons Unknown in a transparent envelope in a prominent position at regular intervals around the perimeter of the Land; and
- e) uploading copies of the documents to be served to a designated injunction webpage (the link to which shall be provided in the aforementioned notice to Persons Unknown).

4. For the avoidance of doubt, in respect of paragraph 4(a)-(d) above, notification shall be effected when the documents are first affixed as ordered, irrespective of whether they are subsequently removed.

Liberty to Apply

5. The Defendants or anyone notified of this Order may each of them apply to the court on 48 hours prior written notice to both the court and the Claimant to vary or discharge this Order (or so much of it as affects that person). The contact details for both the court and the Claimant can be found in paragraphs 9 and 10 below.

Review of the Order against Persons Unknown

6. The Order against the Defendants (Persons Unknown) will expire by the effluxion of time at 23:59 on 18 February 2026. The Claimant may, if so advised, seek the continuation of the Order. Any application for the continuation of the Order must be filed and notified to the Defendants (Persons Unknown) in accordance with paragraph 4(e) above by 4pm on 28 January 2026.

7. A hearing shall be listed on 11 February 2026 with a time estimate of 1 hour. If the Claimant does not make an application for the continuation of the Order, it must notify the court as soon as reasonably practicable and seek to vacate that hearing.

8. Any person other than the Claimant who would like to participate in the abovementioned hearing must file and

Recent download history

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- Witness Statement of Stephen Leach
_ Exhibit SL1 - 28 January 2026 (3).pdf
236 KB • 3 minutes ago
- Exhibit SL1[3951099].pdf
45.6 MB • 3 minutes ago
- Witness Statement of Stephen Leach
_ Exhibit SL1 - 28 January 2026 (2).pdf
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