

IN THE HIGH COURT OF JUSTICE

Claim no. PT-2025-000739

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

PROPERTY TRUSTS AND PROBATE LIST (ChD)

B E T W E E N :

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER

(2) SAM WILLIAMS

(3) IAN JOHNSON

(4) LUKE BADHAREE

**(5) PERSONS UNKNOWN WHO ENTER OR REMAIN UPON ANY PART OF THE LAND
AT THE RATCLIFFE-ON-SOAR POWER STATION (AS DEFINED IN THE
PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT**

Defendants

EXHIBIT "GJR2"

This is the exhibit marked "**GJR2**" referred to in the Second Witness Statement of **GRAEME JAMES ROBERTSON** dated 24 July 2025.

Graeme Robertson
.....

GRAEME JAMES ROBERTSON

EXHIBIT GJR2 – INDEX

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Application for High Court Injunction

NOTICE OF LODGING OF A CLAIM AND APPLICATION AND HEARING ON 30 JULY 2025

TO: (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee and (5) Persons Unknown who enter or remain upon any part of the Land at the Ratcliffe-on-Soar Power Station (as defined in the Particulars of Claim) (the **"Defendants"**)

FROM: Uniper UK Limited ("the **Claimant**")

The Claimant has lodged a claim and application dated 21 July 2025 for an injunction to restrain the Defendants from acts of trespass and/or private nuisance on the land shown edged in red (excluding the land shaded blue) on the plan below, and an application for an order for alternative service of the claim and application documents.

A hearing has been listed at **10:30 on 30 July 2025** in Court 10, The Rolls Building – 7 Rolls Building, London EC4A 1NL.

The claim and application documents may be viewed in hard copy at the outer gatehouse to the Ratcliffe-on-Soar Power Station (marked with a purple 'X' on the below plan) or electronically at <https://www.uniper.energy/ratcliffe-power-station-site-injunction>

Copies may also be obtained from Herbert Smith Freehills Kramer LLP at Exchange House, Primrose Street, London EC2A 2EG, on 020 7374 8000 (cite reference 21992) or by email at injunctions@hsfkramer.com.



Text of Facebook message to First to Fourth Defendants:

PT-2025-000739: Uniper UK Limited v (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee, (5) Persons Unknown (the "Claim")

We are instructed by Uniper UK Limited (the "Claimant"), the owner and operator of the former Ratcliffe-on-Soar Power Station.

Please take note that on 21 July 2025 the Claimant issued the Claim against you and the other stated defendants and applied for an injunction to restrain you from acts of trespass and/or private nuisance on the land shown edged in red (excluding the land shaded blue) on the plan appended to the Claim Form, as well as an order for alternative service.

Electronic copies of the claim and application documents can be found at <https://www.uniper.energy/ratcliffe-power-station-site-injunction>.

An application hearing has been listed before the High Court on Wednesday 30 July 2025 at 10:30 in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL.

Given the contents of this message, you should take independent legal advice.



Track your Item

Proof of delivery

Tracking number: SP975816344GB



A Seiden

Your item was delivered on **24-07-2025**.

Signed for by: JOSH

Service used: Royal Mail Special Delivery Guaranteed 1pm™

Delivered at: 09:45, Thursday 24 July 2025

[← Track another item](#)[Cymraeg](#)

Delivery Attempted

Sorry, we tried to deliver your parcel on **24-07-2025** but there didn't seem to be anyone in. We'll automatically attempt delivery of your parcel the **next working day** so you don't need to do anything. Alternatively, you can book a redelivery for a different date that suits you. Please choose an option below.

If you haven't already, you can also book a redelivery through the [Royal Mail App](#) or book a redelivery [here](#). For Channel Islands and Isle of Man please contact your postal service provider.

Tracking number:

SP975816327GB

Service used:

Royal Mail Special Delivery Guaranteed 1pm™



Tracking history

Statement on behalf of Claimant

Statement of: Gary Da Costa

Statement No: 1

Exhibit No: A

Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER

(2) SAM WILLIAMS

(3) IAN JOHNSON

(4) LUKE BADHAREE

(5) PERSONS UNKNOWN

Defendants

STATEMENT OF PROCESS SERVER

I, Gary Da Costa for A.S.H. (UK) Process Servers Ltd, 3 The Oak Tree, Elmhurst Business Park, Park Lane, Lichfield, Staffordshire, WS13 8EX will state:

1. That I am a process server acting under the direction of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London, EC2A 2EG, and that this statement has been prepared based on evidence collated by myself.
2. That on Wednesday 23 July 2025 at 15:45 hours at 139 Wike Gate Road, Thorne, Doncaster, DN8 5JH I did serve Mr Joshua Barter with the Letter dated 23/07/25, Claim Form, Particulars of Claim, Application Notice, Draft Order, Witness Statement of Stephen Foster with Exhibit SC1, Witness Statement of Andrew James Skelton, Witness Statement of Graeme James Robertson with Exhibit GJR1 and Response Pack issued in this action by way of posting the said documents through the letterbox having received no response at the address.
3. That a copy of the documents served by me is now attached and marked 'A'.
4. I believe that the facts stated in this Witness Statement 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.

Signed: *GMendesDaCosta*

Gary Da Costa - Process Server

Dated: 24 July 2025

Statement on behalf of Claimant

Statement of: Gary Da Costa

Statement No: 1

Exhibit No: A

Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER

(2) SAM WILLIAMS

(3) IAN JOHNSON

(4) LUKE BADHAREE

(5) PERSONS UNKNOWN

Defendants

Exhibit 'A'

This is the exhibit marked 'A' referred to in the Statement of Gary Da Costa.

Mr Joshua Barter
139 Wike Gate Road
Thorne
Doncaster
DN8 5JH

Herbert Smith Freehills Kramer LLP
Exchange House
Primrose Street
London EC2A 2EG
T +44 (0)20 7374 8000
F +44 (0)20 7374 0888
DX28 London Chancery Lane
E injunctions@hsfkramer.com
www.HSFKramer.com

Our ref
21992/31074640

Date
23 July 2025

By hand

Dear Mr Barter

PT-2025-000739: Uniper UK Limited v (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee, (5) Persons Unknown

We act for Uniper UK Limited, the owner and operator of the former Ratcliffe-on-Soar Power Station (the "**Claimant**").

Please find enclosed the following documents in relation to the above claim, in which you are named as a defendant. Electronic copies of the documents can be found at <https://www.uniper.energy/ratcliffe-power-station-site-injunction>:

1. Claim Form
2. Particulars of Claim
3. Application Notice
4. Draft Order
5. Witness Statement of Stephen Foster Close dated 21 July 2025
6. Exhibit SC1
7. Witness Statement of Andrew James Skelton dated 21 July 2025
8. Witness Statement of Graeme James Robertson dated 18 July 2025
9. Exhibit GJR1
10. Form N9 – Response Pack and Notes to Defendant

Please take note that the Claimant has applied for an injunction against you and the other stated defendants in the terms set out in the above documents. An application hearing has been listed before the High Court of Justice (Business & Property Courts of England & Wales) in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL on Wednesday 30 July 2025 at 10:30.

Herbert Smith Freehills Kramer LLP and its affiliated and subsidiary businesses and firms, Herbert Smith Freehills Kramer (US) LLP and its affiliate, and Herbert Smith Freehills Kramer, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills Kramer.

Herbert Smith Freehills Kramer LLP is a limited liability partnership registered in England and Wales with registered number OC310989. Herbert Smith Freehills Kramer LLP is authorised and regulated by the Solicitors Regulation Authority of England and Wales (SRA number: 419682). A list of the members and their professional qualifications is open to inspection at the registered office, Exchange House, Primrose Street, London EC2A 2EG. We use the word partner of Herbert Smith Freehills Kramer LLP to refer to a member of Herbert Smith Freehills Kramer LLP, or an employee or consultant with equivalent standing and qualifications.



HERBERT SMITH
FREEHILLS
KRAMER

Date
23 July 2025
Letter to
Mr Joshua Barter

Given the contents of this letter, you should take independent legal advice.

Yours faithfully

Herbert Smith Freehills Kramer LLP

Herbert Smith Freehills Kramer LLP

CLAIM
DOCUMENTS NOT
REPLICATED FOR
THE PURPOSE OF
EXHIBIT GJR2

Statement on behalf of Claimant

Statement of: Gary Da Costa

Statement No: 1

Exhibit No: A

Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

(1) JOSHUA BARTER

(2) SAM WILLIAMS

(3) IAN JOHNSON

(4) LUKE BADHAREE

(5) PERSONS UNKNOWN

Defendants

STATEMENT OF PROCESS SERVER

A.S.H. (UK) Process Servers Ltd
3 The Oak Tree
Elmhurst Business Park
Park Lane, Lichfield
Staffordshire
WS13 8EX
United Kingdom

Tel: 01543 888218

Our Reference: A/94625

Statement on behalf of Claimant

Statement of: Philip Tyler

Statement No: 1

Exhibit No: A

Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

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(3) IAN JOHNSON

(4) LUKE BADHAREE

(5) PERSONS UNKNOWN

Defendants

STATEMENT OF PROCESS SERVER

I, Philip Tyler for A.S.H. (UK) Process Servers Ltd, 3 The Oak Tree, Elmhurst Business Park, Park Lane, Lichfield, Staffordshire, WS13 8EX will state:

1. That I am a process server acting under the direction of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London, EC2A 2EG, and that this statement has been prepared based on evidence collated by myself.
2. That on Wednesday 23 July 2025 at 15:25 hours at 11 Grove Road, Northampton, NN1 3LH I did serve Mr Luke Badharee with the Letter dated 23/07/25, Claim Form, Particulars of Claim, Application Notice, Draft Order, Witness Statement of Stephen Foster with Exhibit SC1, Witness Statement of Andrew James Skelton, Witness Statement of Graeme James Robertson with Exhibit GJR1, Response Pack issued in this action by way of posting the said documents through the letterbox having received no response from the address.
3. That a copy of the documents served by me is now attached and marked 'A'.
4. I believe that the facts stated in this Witness Statement 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.

Signed:



Philip Tyler - Process Server

Dated: 24th July 2025

Statement on behalf of Claimant
Statement of: Philip Tyler
Statement No: 1
Exhibit No: A
Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

**(1) JOSHUA BARTER
(2) SAM WILLIAMS
(3) IAN JOHNSON
(4) LUKE BADHAREE
(5) PERSONS UNKNOWN**

Defendants

Exhibit 'A'

This is the exhibit marked 'A' referred to in the Statement of Philip Tyler.

Mr Luke Badharee
11 Grove Road
Northampton
NN1 3LH

Herbert Smith Freehills Kramer LLP
Exchange House
Primrose Street
London EC2A 2EG
T +44 (0)20 7374 8000
F +44 (0)20 7374 0888
DX28 London Chancery Lane
E injunctions@hsfkramer.com
www.HSFKramer.com

Our ref
21992/31074640

Date
23 July 2025

By hand

Dear Mr Badharee

PT-2025-000739: Uniper UK Limited v (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee, (5) Persons Unknown

We act for Uniper UK Limited, the owner and operator of the former Ratcliffe-on-Soar Power Station (the "**Claimant**").

Please find enclosed the following documents in relation to the above claim, in which you are named as a defendant. Electronic copies of the documents can be found at <https://www.uniper.energy/ratcliffe-power-station-site-injunction>:

1. Claim Form
2. Particulars of Claim
3. Application Notice
4. Draft Order
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6. Exhibit SC1
7. Witness Statement of Andrew James Skelton dated 21 July 2025
8. Witness Statement of Graeme James Robertson dated 18 July 2025
9. Exhibit GJR1
10. Form N9 – Response Pack and Notes to Defendant

Please take note that the Claimant has applied for an injunction against you and the other stated defendants in the terms set out in the above documents. An application hearing has been listed before the High Court of Justice (Business & Property Courts of England & Wales) in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL on Wednesday 30 July 2025 at 10:30.

Herbert Smith Freehills Kramer LLP and its affiliated and subsidiary businesses and firms, Herbert Smith Freehills Kramer (US) LLP and its affiliate, and Herbert Smith Freehills Kramer, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills Kramer.

Herbert Smith Freehills Kramer LLP is a limited liability partnership registered in England and Wales with registered number OC310989. Herbert Smith Freehills Kramer LLP is authorised and regulated by the Solicitors Regulation Authority of England and Wales (SRA number: 419682). A list of the members and their professional qualifications is open to inspection at the registered office, Exchange House, Primrose Street, London EC2A 2EG. We use the word partner of Herbert Smith Freehills Kramer LLP to refer to a member of Herbert Smith Freehills Kramer LLP, or an employee or consultant with equivalent standing and qualifications.



HERBERT SMITH
FREEHILLS
KRAMER

Date
23 July 2025
Letter to
Mr Luke Badharee

Given the contents of this letter, you should take independent legal advice.

Yours faithfully

Herbert Smith Freehills Kramer LLP

Herbert Smith Freehills Kramer LLP

CLAIM
DOCUMENTS NOT
REPLICATED FOR
THE PURPOSE OF
EXHIBIT GJR2

Statement on behalf of Claimant

Statement of: Philip Tyler

Statement No: 1

Exhibit No: A

Dated: As dated

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

NO: PT-2025-000739

BETWEEN

UNIPER UK LIMITED

Claimant

-and-

**(1) JOSHUA BARTER
(2) SAM WILLIAMS
(3) IAN JOHNSON
(4) LUKE BADHAREE
(5) PERSONS UNKNOWN**

Defendants

STATEMENT OF PROCESS SERVER

A.S.H. (UK) Process Servers Ltd
3 The Oak Tree
Elmhurst Business Park
Park Lane, Lichfield
Staffordshire
WS13 8EX
United Kingdom

Tel: 01543 888218

Our Reference: A/94623



INJUNCTION EXPERTS COMING BACK FOR MORE

10 ●



2👍





Urbex Lost & Found

16h · 🌐

So we are in trouble 🤖 again for exploring a power station lol 🤔

👍🤔 59

28

2

👍

💬

➦

All comments ▼

Author

Urbex Lost & Found

Subscribing to the channel helps us go out to find more places

<https://www.facebook.com/UrbexLostNFound/subscribenow...>

URBEX LOST & FOUND

Subscribe to Urbex Lost &...

16h Like Reply

Janet Baker

Oh gosh. We enjoy it so much wherever you explore. It's the thrill of it all I guess.

8h Like Reply

Author

Urbex Lost & Found

Janet Baker most definitely is lol 🤔

3h Like Reply

Reply to Janet Baker

Moxleys Paranormal World

Isn't that part of the fun tho matey lol

16h Like Reply

Author

Urbex Lost & Found

Moxleys Paranormal World I've got a new one lol 🤔 no more power stations lol 🤔

16h Like Reply

Reply to Moxleys Paranormal W...

Luke Badharee

Just another day in the office mate. 🤔

16h Like Reply

Author

Urbex Lost & Found

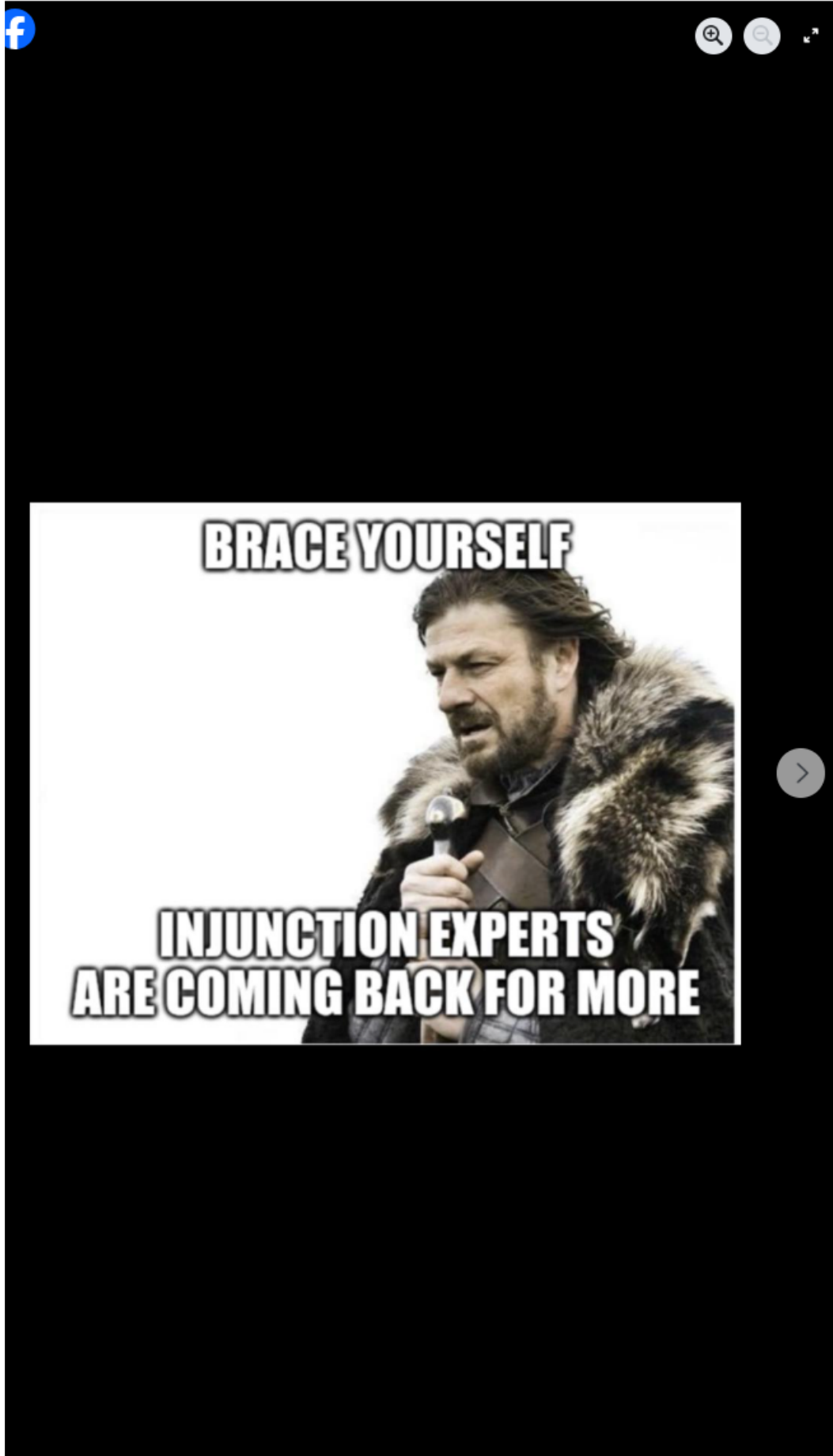
Luke Badharee exactly mate it's more off a challenge now lol 🤔 game on lol 🤔

16h Like Reply

Reply to Luke Badharee



- Noreen Barker
Oh dear ...hope not costly. ...
4h Like Reply
- Author
Urbex Lost & Found
Noreen Barker let's hope not lol 🤔
3h Like Reply
- Reply to Noreen Barker
- Esther Richbourg
All fun and adventure 😊 ...
13h Like Reply
- Author
Urbex Lost & Found
Esther Richbourg exactly just fun we was having
3h Like Reply
- Reply to Esther Richbourg
- Gareth Arthur
Ian's middle name is trouble with a capital T lol
4h Like Reply
- Author
Urbex Lost & Found
Gareth Arthur you got it mate
3h Like Reply
- Reply to Gareth Arthur
- Top fan
Carla Bolle
Oh or just a day home 🥰🥰🌹🌹 ...
15h Like Reply
- Author
Urbex Lost & Found
Carla Bolle never mind find a new playground lol 🤔
3h Like Reply
- Reply to Carla Bolle
- Robin Hickmott
The Injunction hasn't gone though the courts yet. Best get those engines revin boys. ...
47m Like Reply
- Author
Urbex Lost & Found
Robin Hickmott on route lol 🤔
46m Like Reply
- Reply to Robin Hickmott
- B&R Urban Explorers Uk · Follow
Which one we've one lined up sat I think ...



Ratcliffe Power Station Site Injunction



On 21 July 2025, Uniper UK Limited ("Uniper") applied to the High Court for an injunction against (1) Joshua Barter, (2) Sam Williams, (3) Ian Johnson, (4) Luke Badharee and (5) Persons Unknown to restrain them from acts of trespass and/or private nuisance on the power station site (the land shown edged in red, excluding the land shaded blue, on the plan appended to the Claim Form).

Uniper's application has been listed to be heard by the High Court of Justice (Business & Property Courts of England & Wales) on 30 July 2025 at 10:30 in Court 10, 7 Rolls Building, London EC4A 1NL.

Electronic copies of the claim and application documents are available to view and download using the following links:

Sealed Claim Form	PDF - 2.67 MB 
Amended Particulars of Claim	PDF - 1.52 MB 
Sealed Application Notice	PDF - 521.43 KB 
Draft Order	PDF - 852.35 KB 
Witness Statement of Graeme James Robertson dated 18 July 2025	PDF - 134.49 KB 
Exhibit GJR1	PDF - 32.65 MB 
Witness Statement of Stephen Foster Close dated 21 July 2025	PDF - 332 KB 
Exhibit SC1	PDF - 64.86 MB 
Witness Statement of Andrew James Skelton dated 21 July 2025	PDF - 151.92 KB 

From: Injunctions
Sent: 24 July 2025 09:28
To: kayleighwilliams@outlook.com
Subject: PT-2025-000739: Uniper UK Limited v Joshua Barter, Sam Williams, Ian Johnson, Luke Badharee, Persons Unknown [HSF-GBR01.FID5037607]
Attachments: 01 Uniper v PUs and others - Claim Form (sealed).pdf; 02 Uniper v PUs and others - Particulars of Claim.pdf; 03 Uniper v PUs and others - Application Notice (sealed).pdf; 04 Uniper v PUs and others - Draft Order.pdf

Dear Ms Williams

We act for Uniper UK Limited ("**Uniper**"), the owner and operator of the former Ratcliffe-on-Soar Power Station.

Please take note that on 21 July 2025 Uniper issued a claim against Mr Sam Williams and the other stated defendants and applied for an injunction to restrain them from acts of trespass and/or private nuisance on the land shown edged in red (excluding the land shaded blue) on the plan appended to the Claim Form, as well as an order for alternative service.

We have been passed your details by our instructed process server, Equivo, in order to provide you copies with the documentation relating to Uniper's claim and application. Please find attached to this email the Claim Form, Particulars of Claim, Application Notice and Draft Order. Due to file size, the remaining documents (being the Witness Statement of Stephen Foster Close and Exhibit SC1; Witness Statement of Andrew James Skelton and Witness Statement of Graeme James Robertson and Exhibit GJR1) can be viewed and downloaded at the following website: <https://www.uniper.energy/ratcliffe-power-station-site-injunction>.

An application hearing has been listed before the High Court on Wednesday 30 July 2025 at 10:30 in Court 10, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL.

Should you wish to discuss the contents of this email, please contact this firm on 020 7466 2018. However, we of course cannot advise you or Mr Williams and you should take independent legal advice.

Yours sincerely

Herbert Smith Freehills Kramer LLP

T +44 20 7466 2018
www.hsfkramer.com