



Claim Form

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

CHANCERY

In the High Court of Justice, Queen's Bench Division, Manchester District Registry

Fee Account no.	
Help with Fees - Ref no. (if applicable)	H W F - [] [] - [] []
<i>for court use only</i>	
Claim no.	D 3 0 M A 9 3 0
Issue date	19 SEP 2017

Claimant(s) name(s) and address(es) including postcode

(1) City Football Group Limited
 Regent's Place 14th Floor, 10 Brock Street, London NW1 3FG
 (2) Manchester City Football Club Limited
 Etihad Stadium, Etihad Campus, Manchester, M11 3FF

Defendant(s) name and address(es) including postcode
see attached

Brief details of claim

Claim for injunctions, declarations and further or other relief on the grounds of trespass to land



SERVICE BY CLAIMANT

Value

n/a - no money claim

You must indicate your preferred County Court Hearing Centre for hearings here (*see notes for guidance*)

Defendant's name and address for service including postcode

see attached

	£
Amount claimed	n/a
Court fee	£528
Legal representative's costs	to be assessed
Total amount	n/a

For further details of the courts www.gov.uk/find-court-tribunal. When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim No. _____

Does, or will, your claim include any issues under the Human Rights Act 1998? Yes No

Particulars of Claim (~~attached~~)(to follow)

Statement of Truth

~~*(I believe)~~(The Claimant believes) that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement

Full name JOANNE SEED

Name of claimant's legal representative's firm PINSENT MASONS LLP

signed *Joanne Seed* position or office held SENIOR ASSOCIATE

~~*(Claimant)(Litigation friend)~~

(if signing on behalf of firm or company)

(Claimant's legal representative)

**delete as appropriate*

Pinsent Masons LLP
3 Hardman Street
Spinningfields
Manchester M3 3AU

Claimant's or claimant's legal representative's address to which documents or payments should be sent if different from overleaf including (if appropriate) details of DX, fax or e-mail.

Continuation sheet

Defendants' names and addresses

- (1) Harry Davies; 42 Rolleston Avenue, Pettswood, London BR5 1AL
- (2) Hanza Ahmed; 848 Kingsway, Burnage, Manchester M19 1QJ
- (3) Alistair Law; 1 Hepworth Close, Southampton SD19 0ST
- (4) Alexander Farrell; Middlehill House, Crondal Road, GO51 5SS
- (5) Klaus Guip (a child); 19 Hamilton Road, London W5 2EE (the address where he is believed to live with his mother Claudia Ceausu).
- (6) Rikke Brewer; 20 Belle Vue Road, Aldershot GE12 4RX
- (7) Adam Marr; 32 Rigby Street, Salford, M7 4BJ.
- (8) PERSONS UNKNOWN WHO ENTERED THE ETIHAD CAMPUS WITH THE THIRD, FOURTH, FIFTH AND SIXTH DEFENDANTS ON 29 JULY 2017; address presently unknown
- (9) PERSONS UNKNOWN ENTERING OR REMAINING ON THE CLAIMANTS' PROPERTIES LISTED IN THE SCHEDULE BELOW WITHOUT THEIR EXPRESS OR IMPLIED CONSENT; address presently unknown

SCHEDULE OF PROPERTIES

CFG-related Properties

Asset	Address	Control
Manchester City Football Club		
Etihad Stadium	Etihad Campus, Manchester M11 3FF	MCFC control the stadium (and areas inside the gated perimeter) under a long lease from Manchester City Council
City Football HQ	North Gate, 400 Ashton New Road, Manchester M11 4TQ	MCFC owns the freehold
The Academy	West Gate, Etihad Campus, Alan Turing Way, Manchester M11 4TQ	MCFC owns the freehold
First Team Centre	South Gate One, Etihad Campus, 161 Clayton Lane, Manchester M11 4TS	MCFC owns the freehold
Facilities Management Building	South Gate One, Etihad Campus, 161 Clayton Lane, Manchester M11 4TS	MCFC owns the freehold
London Office	14th Floor, 10 Brock Street, Regent's Place, London NW1 3FG	Office space rented from British Land
City Football Japan	Level 14 Hibiya Central Building, 1-2-9 Nishi Shimbashi Minato-ku, Tokyo 105-0003	CFG rent the office space
City Football Middle East	TwoFour54 Park Rotana Complex, Khalifa Park, Office 807 – C, P.O Box 769321, Abu Dhabi, UAE	CFG rent the office space
City Football Singapore	1 George Street, #15-01, Singapore 049145	CFG rent the office space
New York City Football Club		
Headquarters	600 Third Ave, 30th Floor, New York, NY 10016	CFG rent the office space

Training Facility	SUNY Purchase, 735 Anderson Hill Road, Purchase, New York, NY 10577	CFG rent the land from the State University of New York
Yankee Stadium	1 East 161st Street, Bronx, New York	Only occupied by the club on match days
Melbourne City Football Club		
City Football Academy Melbourne	2 Crissane Road, Bundoora, Victoria 3083 Australia	CFG lease the land from La Trobe University
AAMI Park Stadium	Edwin Flack Field, Olympic Boulevard, Melbourne City, Victoria, Australia	Only occupied by the club on match days
Yokohama F Marinos Football Club		
Headquarters	Yokohama Marinos, DSM Shinyokohama bldg., 5F 2-6-3 Shin-yokohama, Kouhoku, Yokohama, 223-0033 Japan	Information to follow
Nissan Stadium Football Offices	Yokohama Marinos Football Department, Nissan Stadium, 3300 Kozukuecho, Kōhoku-ku, Yokohama-shi, Kanagawa- ken 222-0036, Japan	Information to follow
Club Atlético Torque		
Headquarters	Roque Graseras 694, Montevideo, Uruguay	CFG lease from Algranati Group
Estadio Parque Alfredo Víctor Viera Stadium	Avenida Buschental s/n, 11.700, Montevideo, Uruguay	CFG lease from Montevideo Wanderers Futbol Club

Complejo Daniel Marsicano Training Facility	Camino Curuzu Cuatia 3070, Montevideo, Uruguay	CFG lease from Torque's Civil Association
Girona FC		
Estadi Municipal Montivili Stadium	Avinguda Montivili, 141 (17003), Girona, Spain	CFG rent from Girona Municipality
Anexo Estadi Municipal Montivili Training Facility	Avinguda Montivili, 141 (17003) Girona, Spain	CFG rent from Girona Municipality
Camp de Futbol Municipal de Riudarenes Training Facility	Av. dels Segadors, s/n (17421), Riudarenes, Girona, Spain	CFG rent from Riudarenes Municipality
Municipal De Peralada Training Facility	Municipal Peralada Passeig Catalunya, s/n (17491 Peralada), Spain	CFG rent from Peralada Municipality
Camp de Futbol Vilablareix Training Facility	Avda. Lluís Companys, 75 (17180 Vilablareix), Spain	CFG rent from Vilablareix Municipality
Camp de Futbol Municipal de Riudellots Training Facility	C/ Pineda, 18 (17457) Riudellots de la Selva, Girona, Spain	CFG rent from Riudellots Municipality

Camp de futbol Municipal de Torres de Palau Training Facility	Complejo Deportivo Torres de Palau, C/ Església de Sant Miquel, 16 (17003 Girona), Spain	CFG rent from Girona Municipality
Camp Municipal de Vila-Roja Training Facility	Grup Vila-Roja 181 (17004 – Girona), Spain	CFG rent (at certain times) from Girona Municipality