

**Application notice**

For help in completing this form please read the notes for guidance form N244Notes.

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<b>Name of court</b> County Court at Cardiff	<b>Claim no.</b> CF03361
<b>Fee account no.</b> (if applicable)	<b>Help with Fees – Ref. no.</b> (if applicable)
	H   W   F - [ ] [ ] [ ] - [ ] [ ] [ ]
<b>Warrant no.</b> (if applicable)	
<b>Claimant's name</b> (including ref.) Maurice John Kirk	
<b>Defendant's name</b> (including ref.) Chief Constable of South Wales Police	
<b>Date</b> 12th Sept 2021	

1. What is your name or, if you are a legal representative, the name of your firm?

Maurice John Kirk

2. Are you a  Claimant  Defendant  Legal Representative  
 Other (please specify) Applicant.

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

An Order for Specific Disclosure of documents as set out under CPR 32.12.and for the issuing of witness summonses.

4. Have you attached a draft of the order you are applying for?  Yes  No
5. How do you want to have this application dealt with?  at a hearing  without a hearing  
 at a telephone hearing
6. How long do you think the hearing will last? 2 [ ] Hours [ ] Minutes  
 Is this time estimate agreed by all parties?  Yes  No

7. Give details of any fixed trial date or period

None

8. What level of Judge does your hearing need?

District Judge

9. Who should be served with this application?

Dolmans solicitors on behalf of the Chief Constable of South Wales Police

- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- ~~the attached witness statement~~
- ~~the statement of case~~
- the evidence set out in the box below

The defendant to disclose:

1. Gold, Silver, Bronze, MAPPA, OASys, MG6D and PII records of Operation Orchid
2. All records re police helicopter flights re Operations Chalice and Orchid
3. All Vale of Glamorgan and Cardiff records of Operation 'Orchid' & 'Chalice'
4. Gold, Silver, Bronze, MAPPA, OASys, MG6D and PII records of Operation Chalice
5. Gold, Silver, Bronze, MAPPA, OASys, MG6D and PII records of Operation Bridger
6. **All minutes relating to Gold Groups are retained locally by that 'OCU'.  
(These documents must include closure reports, Gold Group logs and other material such as Critical Incident Management Logs).**
7. Nottingham police records relating to Operation Chalice and exhibit ARH1
8. Scott Arms records relating to Operation Chalice and exhibit ARH1
9. Duxford Museum records relating to ARH1
10. Bedford Shuttleworth Air Museum records relating to Operation Chalice (five machineguns)
11. Chepstow Forensic Scientific Services records relating to Operation Chalice and ARH1
12. RAF records (2000 Farnborough Airshow and Lynham airfields) of exhibit ARH1
13. Gold, Silver, Bronze, MAPPA, OASys, MG6D and PII records of 'Foxy'
14. Gold, Silver, Bronze, MAPPA, OASys, MG6D and PII records of PC Nigel Brown
15. Full content of all police and retired police personal pocket notebooks of Operation Chalice
16. Full content of HMP Cardiff & G4S run HMP Parc records of Operation Chalice & Orchid
17. Full content of HMP Parc stolen Caswell Clinic medical records of claimant re Operation Chalice and civil claim 1CF03361
18. Andrew Huxtable Prosecution exhibits AH1 & AH2
19. Andrew Huxtable's Home Office controlled video and photographs of his examination of ex ARH 1
20. Litts of Newport gun shop, South Wales, records relating to Operation Chalice and ARH1
21. Medica lrecords of bridget Craddockre Operation chalice and Orchid
22. Medical records of Dr Metters re Operations Chalice & Orchid

The Cardiff Count Court to issue witness summonses, to the following, to attend 1CF93361 civil damages claim on behalf of the claimant:

- i) Tim Dodson, clerk of court, with the claimant's defense statement for T20097445 and court log
- ii) Kirstie Kirk with records of her Operations Chalice and Orchid involvement
- iii) Genevieve Kirk with records of her Operations Chalice and Orchid involvement
- iv) 'Foxy', under cover police officer, with his records of Operations Chalice and Orchid
- v) Nigel Brown of South Wales Police with his records of operation Chalice and Orchid
- vi) Retired DC James Philips with his records of Operations Chalice and Orchid
- vii) Retired inspector Phil Davies with his records of Operations Chalice and Orchid
- viii) Police officer Kerslake with his records of Operations Chalice, Orchid & BS612159 damages claim
- ix) Police officer Redrupp with his records of Operations Chalice and Orchid & BS612159 damages cl
- x) Police officer Williams with his records of Operations Chalice Orchid & BS612159 damages claim
- xi) Police officer Andrew Rice with records of Operations Chalic Orchid & BS612159 damages claim
- xii) Police Officer Davidson with his records of Operations Chalice/Orchid & BS612159 damages claim
- xiii) Police Officer Morgan with his records of Operations Chalice/Orchid & BS612159 damages claim
- xiv) Police Officer Dyson with his records of Operations Chalice/Orchid & BS612159 damages claim
- xv) Appropriate Adult Mr Reeves who witnessed Operation Chalice and Orchid helicopter raid

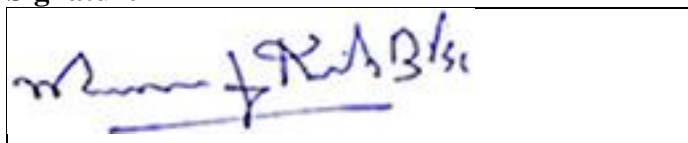
# Statement of Truth

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.

**I believe** that the facts stated in section 10 (and any continuation sheets) are true.

~~The Applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.~~

## Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

## Date

Day

Month

Year

12<sup>th</sup>

September

2021

Full name

Maurice John Kirk

Name of applicant's legal representative's firm

If signing on behalf of firm or company give position or office held

Applicant's address to which documents should be sent.

Building and street

34a Westgate Street  
~~24a Westgate Street~~

Second line of address

Town or city

Taunton

County (optional)

Somerset

Postcode

T | A | 1 | 4 | E | Y |

If applicable

Phone number

07463 362071

Fax number

N/A

DX number

N/A

Your Ref.

ICF03361

Email

[maurice@kirkflyingvet.com](mailto:maurice@kirkflyingvet.com)