

Application notice

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

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Name of court High Court of Justice, KBD, Media and Communications List		Claim no. KB-2025-003209
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
	H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) Setu Kamal		
Defendant's name (including ref.) (1) Tax Policy Associates Limited (2) Dan Neidle		
Date	20 October 2025	

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

Good Law Project Limited

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative
☐ Other (please specify) [] [] [] [] [] [] [] [] [] []

If you are a legal representative whom do you represent?

The Defendants

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

An order that the Claim Form and Particulars of Claim be struck out for being a SLAPP and/or pursuant to CPR 3.4(2)(c) and/or that parts of the Claim Form and Particulars of Claim be struck out pursuant to CPR 3.4(2)(a) and/or summary judgment on the whole of the claim. If the claim continues, security for costs.

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 remote hearing
6. How long do you think the hearing will last? 5 [] 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?
Judge
9. Who should be served with this application?
Claimant
- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.
To be served on Claimant by the Defendants

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

If necessary, please continue on a separate sheet.

This Application contains an Application for Summary Judgment under CPR 24. The Claimant's attention is drawn to CPR 24.5(1).

The Defendants will rely on evidence including: (1) the Witness Statement of Matthew Gill and (2) the Witness Statement of Daniel Neidle.

The Defendants believe the Claimant has no real prospect of succeeding on the claim and knows of no reason why the disposal of the claim should await trial.

The Claimant's attention is drawn to their right to rely on evidence opposing the application (CPR 24.5(1)(f)).

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

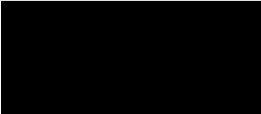
☒ No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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								
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2	0									
1	0									
2	0	2	5							

Full name

Matthew Gill

Name of applicant's legal representative's firm

Good Law Project Limited

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

Senior Associate

Applicant's address to which documents should be sent.

Building and street

Good Law Project Limited

Second line of address

[REDACTED]

Town or city

London

County (optional)

Postcode

[REDACTED]

If applicable

Phone number

Fax phone number

DX number

Your Ref.

P045/DAN01/01

Email

[REDACTED]