

IN THE MAGISTRATES' COURT SITTING AT WESTMINSTER

**IN THE MATTER OF AN APPEAL UNDER THE PRIVATE HIRE VEHICLES
(LONDON) ACT 1998**

B E T W E E N:

UBER LONDON LIMITED

Appellant

-and-

TRANSPORT FOR LONDON

Respondent

**SKELETON ARGUMENT OF TRANSPORT FOR LONDON FOR THE CASE
MANAGEMENT CONFERENCE ON 27 FEBRUARY 2020**

THE DRAFT DIRECTIONS

1. The parties have sought to agree draft directions, in advance of the Case Management Conference. At the time of preparing this skeleton argument, those directions are not final. TfL will address the Court orally on any outstanding matters, or areas of dispute, at the hearing.

THE APPLICATIONS TO BE AN INTERESTED PARTY

2. TfL's position on the Licensed Taxi Drivers' Association's ("**LTDA**") application to participate in the appeal has not changed from the hearing on 13 February 2020. TfL relies upon its skeleton argument attached.
3. TfL takes the same position on the United Trade Action Group's ("**UTAG**") application to become an interested party: it is ultimately for the Court to decide whether it will be assisted by UTAG's participation at the appeal hearing. TfL does not resist that application.
4. Nonetheless, TfL rejects any suggestion from UTAG (and indeed the LTDA) that: (i) TfL's conduct at the previous appeal hearing in 2018 was inadequate, and that TfL failed

properly to assist the Court; (ii) TfL's conduct at the hearing of this appeal would be inadequate and it would fail properly to test and challenge ULL's evidence; and (iii) TfL has failed in its role as regulator in relation to ULL, or more generally.

5. TfL is keen to ensure that any grant of permission to the interested parties supports the efficient disposal of the appeal and does not result in the hearing becoming unwieldy or unfocussed. TfL supports the Court's indication, at the hearing on 13 February 2020, that it will review the scope of the interested parties' participation shortly before the appeal hearing. That will enable the Court to identify the topics in respect of which it would be assisted by submissions from the interested parties and how long any such submissions should be.

Tim Johnston

20.02.2020