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Our Ref: RT/37

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Date: 07/08/20

Secretary of State Health & Social Care
39 Victoria Street
London
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And

Secretary of State for Transport
33 Horseferry Road
London
SW1P 4DR

And

Constitutional and Social Care Public Law Team
Government Legal Department
102 Petty France
London SW1H 9GL

Dear Sirs

**Re: The Peoples Brexit (1) Dr Kevin Corbett (2) Stephen Morris (3) - v -
Secretary of State Health & Social Care (1) Secretary of State for Transport (2)
Constitutional and Social Care Public Law Team (3)**

1 Proposed claim for judicial review

To: The Secretary of State for Health and Social Care (“The Health Secretary”), and
The Secretary of State for Transport (“The Transport Secretary”)
Constitutional and Social Care Public Law Team
Government Legal Department
102 Petty France
London SW1H 9GL

Principal: Robin Tilbrook
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2 The claimants

The Peoples Brexit
Dr Gavin Corbett
Mr Stephen Morris

3 The defendant's reference details

None available.

4 The details of the claimants' legal advisers dealing with this claim

Tilbrook's Solicitors
Quires Green
Willingale
Ongar
Essex CM5 0QP

5 The details of the matters being challenged

A) The Coronavirus Act 2020

Section 51

Schedule 21 Powers relating to potentially infectious persons (England and Wales)

Section 52

Schedule 22 Powers to issue directions relating to events, gatherings and premises

Sections 59 – 63

Sections 64 - 68 Postponement of elections, referendums, recall petitions and canvass (England and Wales)

Section 37

Schedule 16 Temporary closure of educational institutions and childcare premises

B) "The Coronavirus Restrictions (No. 2) Regulations"

The Health Protection (Coronavirus, Restrictions) (No. 2) (England) Regulations SI 684/2020 which were made by the Health Secretary on 3rd July 2020 and came into force on 4th July 2020 (as amended).

Regulation 4 "Requirement to close premises and businesses during the emergency" and Schedule 2 "Businesses subject to closure"

Regulation 5 "Restrictions on gatherings"

Regulation 7 "Enforcement of requirement" and, consequentially:

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Regulation 8 “Offences and penalties”

Regulation 9 “Fixed Penalty notices”

Regulation 10 “Prosecutions”

C) “The Coronavirus Restrictions (No. 3) Regulations”

The Health Protection (Coronavirus, Restrictions) (England) (No. 3) Regulations SI 750/2020 which were made by the Health Secretary on 16th July 2020 and came into force on 18th July 2020 (as amended).

Regulation 2 “Directions by local authorities: general”

Regulation 3 “Powers of Secretary of State”

Regulation 4 “Directions relating to individual premises”

Regulation 5 “Directions relating to events”

Regulation 6 “Directions relating to public outdoor spaces”

Regulation 12 “Enforcement of requirements” and, consequentially:

Regulation 13: “Offences and penalties”

Regulation 14: “Fixed Penalty notices”

Regulation 15: “Prosecutions”

D) “The Coronavirus International Travel Regulations”

The Health Protection (Coronavirus, International Travel) (England) Regulations SI 568/2020 which were made by the Health Secretary on 2nd June 2020 and came into force on 8th June 2020 (as amended).

Regulation 3 “Requirement to provide information” and, consequentially:

Regulation 10 “Self-incrimination”

Regulation 4 “Requirement to self-isolate”

Regulation 5 “Enforcement of requirement to self-isolate” and, consequentially:

Regulation 6 “Offences and penalties”

Regulation 7 “Fixed penalty notices”

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Regulation 8 “Prosecutions”

Regulation 9 “Power to use and disclose information”

E) “The Face Coverings Regulations”

The Health Protection (Coronavirus, Wearing of Face Coverings on Public Transport) (England) Regulations SI 592/2020 which were made by the Transport Secretary on 14th June 2020 and came into force on 15th June 2020.

Regulation 3: “Requirement to wear a face covering when on public transport”

Regulation 5 “Enforcement of requirement to wear a face covering whilst using public transport” and, consequentially:

Regulation 6 “Offences and penalties”

Regulation 7 “Fixed penalty notices”

Regulation 8 “Prosecutions”

Regulation 9: “Review”

The Health Protection (Coronavirus, Wearing of Face Coverings in a Relevant Place) (England) Regulations SI 791/2020 which were made by the Health Secretary on 23rd July 2020 and came into force on 24th July 2020.

Regulation 3 “Requirement to wear a face covering whilst entering or remaining within a relevant place”

Regulation 5 “Enforcement of requirement to wear a face covering whilst entering or remaining within a relevant place” and, consequentially:

Regulation 6 “Offences and penalties”

Regulation 7 “Fixed penalty notices”

Regulation 8 “Prosecutions”

Regulation 9: “Review”

F) “The North of England Regulations”

The Health Protection (Coronavirus, Restrictions on Gatherings) (North of England) Regulations SI 828/2020 which were made by the Health Secretary on 4th August 2020 and came into force on 5th August 2020.

Regulation 5 “Restrictions on gatherings in private dwellings”

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Regulation 6 "Linked households"

Regulation 7 "Restrictions on other gatherings"

Regulation 8 "Enforcement of restrictions in this Part" and, consequentially,

Regulation 9 "Offences and penalties"

Regulation 10 "Fixed penalty notices"

Regulation 11 "Prosecutions"

6 The details of any Interested Parties

Not applicable

7 The issues

The Coronavirus Act 2020

The Act came into force on 23rd March with the 'lockdown' before it actually received Royal Assent on 25th March. The applicants will say that whereas section 1 (1) of the Act defines 'coronavirus' as being Covid-19 or it's other name SARS Cov-2, that 'covid-19' has not been subjected to the 130-year established legal, medical and scientific procedure that recognises if it is actually a disease or virus or not, which is known as the Koch Postulates.

In passing the Act complained of, the Government has failed to have any or any adequate regard for the Department of Health's own report 'UK Influenza Pandemic Preparedness Strategy 2011'.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/213717/dh_131040.pdf

This report made it clear that the Rule of Law should be upheld and life should carry on as normal for the healthy.

Further, the 'lockdown' and 'social distancing' were measures that were forced upon us and were based upon advice by Government 'advisors', from 'modeling' estimates and reports not even peer reviewed. These 'advisors' included Professor Neil Ferguson who has a track record of failure, including the slaughter of millions of healthy animals and the ruin of livelihoods during the Foot and Mouth debacle.

The World Health Organisation themselves in their report 'Nonpharmaceutical Interventions for Pandemic Influenza, National and Community Measures' from 2006, the writers of which include current members of SAGE, criticises forced isolation and quarantine branding these measures "ineffective and impractical". It also states that "Legal authority and procedures for implementing interventions should be understood in advance and should respect cultural differences and human rights."

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Crucially, the report states that at Phase 6 of a Pandemic, when it is officially declared, measures such as tracing and quarantine should not be attempted. It states "Patient isolation and tracing and quarantine of contacts should cease, as such measures will no longer be feasible or useful."

For these reasons, the Act is irrational.

In addition, the Applicants will say the Act breaches the overarching constitutional provisions of the Declaration of Right 1689 which were enacted in the Crown and Parliament Recognition Act 1689 and of the Bill of Rights 1689 and of the Human Rights Act 1988 together with the European Convention of Human Rights appended thereto are all constitutional provisions and statutes which conditions the relationship between citizens and state in a general overarching manner and defines the scope of fundamental constitutional rights. In the premises, the 1689 Acts and the 1998 Act may not be impliedly repealed. As a consequence of the matters set out hereafter, the Coronavirus Act 2020 purports to have abrogated the fundamental rights under the 1998 Act without express words or words so specific that the inference of an actual determination to abrogate is irresistible.

The Coronavirus Act contains no such unambiguous words to repeal or amend the 1998 Act and the rights guaranteed therein and insofar as it affects rights of citizens under the Bill of Rights and the Human Rights Act it is Null and Void.

In this regard, the applicants observe that the only references to the 1998 Act in the Coronavirus Act are at Schedule 12 (4 and 6) (Powers And Duties Of Local Authorities In England) in respect of duties to meet needs for care and support. By example and by contrast, sections 20, 23 and 30 of the Civil Contingencies Act 2004 make express provisions for the protection of the Convention Rights under the Human Rights Act 1998. The Government chose not to proceed under the 2004 Act in its response to the perceived threat of Coronavirus and the 2020 Act offers no protection for citizens fundamental rights.

As a consequence, the Applicants will further say that Section 51 and Schedule 21 of the Coronavirus Act (Powers relating to potentially infectious persons) insofar as they apply to England and Wales are unlawful interferences with Article 5 of the Convention, the right to liberty and security, together with and Article 8, the right to respect for private and family life.

Section 52 and Schedule 22 of the Coronavirus Act (Powers to issue directions relating to events, gatherings and premises) are unlawful interferences with Article 11, the right of freedom of assembly and association

Sections 59 – 63 and 64 - 68 of the Coronavirus Act (Postponement of elections, referendums, recall petitions and canvass) insofar as they apply to England and Wales are in breach of Article 3 of the Protocol to the Convention, the right to free elections at reasonable intervals.

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Schedule 16 of the Coronavirus Act (Temporary closure of educational institutions and childcare premises) is in breach of Article 3 of the Protocol to the Convention, the right to education.

The Statutory Instruments

On 17th April 2020 the Foreign Secretary Dominic Raab confirmed that the government had introduced five tests for the easing of the Coronavirus Lockdown as follows.

- 1 Making sure the NHS can cope
- 2 A 'sustained and consistent' fall in the daily death rate
- 3 Rate of infection decreasing to 'manageable levels'
- 4 Ensuring supply of tests and PPE can meet future demand
- 5 Confidence that any adjustments would not risk a second peak that would overwhelm the NHS

In his statement to the House of Commons on 23 June 2020, the Prime Minister confirmed that:

“Taking everything together, we continue to meet our five tests and the Chief Medical Officers of all four home nations have downgraded the UK’s Covid Alert Level from four to three, meaning that we no longer face a virus spreading exponentially, though it remains in general circulation.”

Source:

<https://www.gov.uk/government/speeches/prime-ministers-statement-to-the-house-on-covid-19-23-june-2020>

According to the Government's own "Daily additional COVID-19 associated UK deaths by date reported" schedule, the numbers were 1,173 at the height of the epidemic on 21st April 2020 but this fell to 326 on 2nd June; 137 on 3rd July; 16 on 6th July; 85 on 9th July; 66 on 16th July and 53 on 23rd July. In the premises, the daily death rate had reduced substantially at the time of the making of The Coronavirus Restrictions Regulations Nos 2 and 3; The Coronavirus International Travel Regulations; the Face Coverings Regulations and the North of England Regulations.

Similarly, the “Daily number of lab-confirmed cases in England by specimen date” by category of previously-reported or newly-reported instances was 3,971 on 21st April 2020; 1,345 on 2nd June; 543 on 3rd July; 303 on 16th July and 401 on 23rd July.

The trend for both is self-evidently significantly downward.

Source: <https://coronavirus.data.gov.uk/>

No impact assessment was prepared for any of the Statutory Instruments complained of.

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In the premises, the Secretaries of State have

- Failed to take into account relevant considerations in deciding to make the Regulations and all of them, namely, that the government's own tests were being met as at 23rd June 2020 and in particular that both the daily death and infection rates were and continued to fall prior to the Regulations being made and before their amendment.
- Further, in neglecting to order the preparation of any impact assessments prior to making the said Regulations, they did not take into account the relevant consideration of any adverse effects on the economy of implementing or maintaining the Regulations
- Acted irrationally by making and/or maintaining the Regulations notwithstanding the fact that the second and third of the government's five tests continued to be met.
- Acted disproportionately by deciding not to rescind the Regulations complained of at the time of their review and amendment
- Further, in neglecting to order the preparation of any impact assessments prior to making the said Regulations, did not take into account the relevant consideration of any adverse effects on the Convention Rights enjoyed by the public

In this latter regard, the applicants condescend to the following particulars.

B) "The Coronavirus Restrictions (No. 2) Regulations"

The applicants will say that Regulation 4 and Schedule 2, (business closures), are an unlawful interference with Article 1 of the First Protocol (ECHR); the entitlement of every natural or legal person to the peaceful enjoyment of his possessions.

Regulation 5 (restrictions on gatherings) is an unlawful interference with Article 11 of the Convention; the right to freedom of peaceful assembly and to freedom of association with others.

Regulations 7 – 10 inclusive should also be rescinded accordingly.

SI 684/2020 was not made until 10 am on 3rd July 2020 or laid before Parliament until 3 pm that same day. Accordingly, the Secretary of State for Health wrongly-exercised his discretion under Section 45R of the 1984 Act in making the instrument without a draft having been laid before and approved by a resolution of each House of Parliament when there was no urgency to do so.

C) "The Coronavirus Restrictions (No. 3) Regulations"

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The applicants will say that the Health Secretary acted irrationally by failing to have any or any adequate regard to the powers vested him by Section 45F (2) of the Public Health Act 1984 in that the Regulations make no provision for the payment of incentive payments, compensation or expenses for those subject to prohibitions, requirements or restrictions under any prospective Directions.

Further, in failing to provide those subject to Directions opportunities to make prior representations before they are given, the Regulations as made are in breach of the rules of natural justice at common law and of article 6.1 and Article 1 of the First Protocol.

Regulations 4; 5; 6; and 7 are an unlawful interference with Article 1 of the First Protocol; the entitlement of every natural or legal person to the peaceful enjoyment of his possessions.

Regulation 4; 5; 6; and 7 are an unlawful interference with Article 11 of the Convention; the right to freedom of peaceful assembly and to freedom of association with others.

Regulations 12 – 15 inclusive should also be rescinded accordingly.

That the Regulations are a significant assault on the Convention Rights is underlined by government Guidance of 17th July 2020, Firstly, “COVID-19 contain framework; a guide for local decision makers.”

<https://www.gov.uk/government/publications/containing-and-managing-local-coronavirus-covid-19-outbreaks/covid-19-contain-framework-a-guide-for-local-decision-makers>

Secondly, “Local authority powers to impose restrictions: Health Protection (Coronavirus, Restrictions) (England) (No 3) Regulations 2020”.

<https://www.gov.uk/government/publications/local-authority-powers-to-impose-restrictions-under-coronavirus-regulations/local-authority-powers-to-impose-restrictions-health-protection-coronavirus-restrictions-england-no3-regulations-2020>

The former observes, inter alia, that:

“Wherever possible, actions to address outbreaks of COVID-19 will be undertaken in partnership with local communities, on the basis of informed engagement and consent. UTLAs will have powers to close individual premises, public outdoor places and prevent specific events. This means that UTLAs will no longer have to make representations to a magistrate in order to close a premises. Premises which form part of essential infrastructure will not be in scope of these powers. A non-exhaustive list of the types of categories of infrastructure will be set out in government guidance.

This significantly increases the powers available to UTLAs. We expect these powers to be used with discretion, and only to be used having had regard to any advice given to it by its DPH. . .”

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The latter that:

“Before making a direction, local authorities will need to gather sufficient evidence to demonstrate that these tests have been met. This evidence may come from a range of sources, including information provided to the local authority from local experts, through the Local Resilience Forum, from NHS Test and Trace (including the Joint Biosecurity Centre (JBC)), from Public Health England (PHE) and from other sources. A local authority must consult with the director of public health, and assess whether the conditions for taking action have been met. It must have regard to any advice given to it prior to issuing a direction, or to revoke such a direction.

A local authority should also consult the police prior to issuing a direction, and any neighbouring police forces if the direction prohibits, requires or restricts access to a premise, event or public outdoor place that is situated against a Local Resilience Forum boundary. Local authorities should be clear about why they are taking directive action and communicate this clearly to the Secretary of State, the person(s) to whom the direction applies and, where appropriate, those impacted by the direction.”

Whereas the latter Guidance additionally reminds local authorities that they must have due regard to the Public Sector Equality Duty as set out in section 149 of the Equality Act 2010, there is no provision in accordance with Article 6 rights whereby fairness requires that any individual concerned should be afforded an opportunity to make prior representations before a Direction is handed down.

SI 750/2020 was not made until 16th July 2020 or laid before Parliament until the following day. Accordingly, the Secretary of State for Health wrongly-exercised his discretion under Section 45R of the 1984 Act in making the instrument without a draft having been laid before and approved by a resolution of each House of Parliament when there was no urgency to do so.

D) “The Coronavirus International Travel Regulations”

The Secretary of State Acted irrationally by increasing the review period of the need for the requirements from 21 days to 28 days in the amended SI 568/2020 notwithstanding the fact the second and third of the government’s five tests continued to be met

Regulations 3; 9 and 10 (providing and disclosing information) are an unlawful interference with Article 8 of the Convention: The right to respect for private and family life.

Regulations 4 and 5 (self-isolation requirements) interfere with Article 5 of the Convention: The right to liberty and security of person

Regulations 6 – 9 inclusive should also be rescinded accordingly

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E) “The Face Coverings Regulations”

Neither of the Regulations were deemed necessary when UK deaths from Covid were at their peak in April of 2020.

The Government has published the minutes of SAGE meetings up to and including that of the 46th meeting held on 9th July 2020 but has not published the minutes of the SAGE 42 meeting:

<https://www.gov.uk/search/transparency-and-freedom-of-information-releases?organisations%5B%5D=scientific-advisory-group-for-emergencies&page=1&parent=scientific-advisory-group-for-emergencies>

In none of those meetings for which minutes have been published was the expert advice that face coverings ought to be worn by members of the public in circumstances now formalised by SI 592/2020 or SI 791/2020.

Indeed, as recently as 10th July 2020, the day after the 46th SAGE meeting, the Government set out advice in the document: "Keeping workers and customers safe during COVID 19 in shops and branches. COVID 19 secure guidance for employers, employees and the self employed"

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/shops-and-branches>

Section 6 reads in part as follows:

“It is important to know that the evidence of the benefit of using a face covering to protect others is weak and the effect is likely to be small, therefore face coverings are not a replacement for the other ways of managing risk, including minimising time spent in contact, using fixed teams and partnering for close-up work, and increasing hand and surface washing.”

Accordingly, it is plain that in making the Face Coverings Regulations, the Secretaries of State for Health and Transport failed to take into account factors that ought to have been taken into account, namely, that no scientific advice supported the making of the instrument. Further, the Secretaries of State failed to take into account the government’s own “Five Tests” and in particular tests 2 and 3 in making the Regulations.

Further or alternatively, the decisions were so unreasonable that no reasonable authority would ever consider imposing them.

Further, against the background of the state of the scientific advice and compliance with the “Five Tests”, it is plain that the making of the Regulations and each of them was disproportionate under Section 45D of the Public Health (Control of Diseases) Act 1984.

A statement entitled “Face coverings to become mandatory on public transport” was delivered by the Secretary of State for Transport at the Downing Street coronavirus briefing as long ago as 4th June 2020.

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<https://www.gov.uk/government/news/face-coverings-to-become-mandatory-on-public-transport>

SI 592/2020 was not made until 14th June 2020 or laid before Parliament until 15th June 2020. Accordingly, the Secretary of State for Transport wrongly-exercised his discretion under Section 45R of the 1984 Act in making the instrument without a draft having been laid before and approved by a resolution of each House of Parliament when there was no urgency to do so.

A statement entitled “Face coverings to be mandatory in shops and supermarkets from 24 July” was delivered by the Secretary of State for Health to Parliament as long ago as 14th July 2020.

<https://www.gov.uk/government/speeches/face-coverings-to-be-mandatory-in-shops-and-supermarkets-from-24-july>

SI 791/2020 was not made until 9 am on 23rd July 2020 or laid before Parliament until 1.15 pm that same day. Accordingly, the Secretary of State for Health wrongly-exercised his discretion under Section 45R of the 1984 Act in making the instrument without a draft having been laid before and approved by a resolution of each House of Parliament when there was no urgency to do so.

Finally, the requirement for a Review under Regulation 9 of both Statutory Instruments before the end of the period of six months beginning with the day on which they came into force, the Secretaries of State have unlawfully fettered their discretion by failing to make provision for such review in accordance with the developing state of the scientific advice rather than an arbitrary time period.

F) “The North of England Regulations”

Regulations 5 to 7 inclusive are an unlawful interference with Article 11 of the Convention; the right to freedom of peaceful assembly and to freedom of association with others.

Regulations 8 – 11 inclusive should also be rescinded accordingly.

Further, on 31st July 2020 the Government published Guidance in the document “North of England: local restrictions” <https://www.gov.uk/guidance/north-west-of-england-local-restrictions-what-you-can-and-cannot-do>

Within the “Contents” section of that Guidance, the following was written:

“From 31 July 2020, if you live in these parts of Greater Manchester, East Lancashire and West Yorkshire, you should follow these rules when meeting people who you do not live with. Separate guidance advises on the similar rules imposed in Leicester.”

And under the section headed “Social Contact” these words appear:

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“The government will pass new laws to enforce the changes to meeting people in private homes and gardens. The police will be able to take action against those that break these rules, including asking people to disperse and issuing fixed penalty notices (starting at £100 – halving to £50 if paid in the first 14 days – and doubling for subsequent offences).”

As at the date of publication of this Guidance, no such new laws had been passed.

Moreover, In a Tweet sent from his official Twitter account with over 330,000 followers, @MattHancock, on 30th July at 9.17 pm, the Health Secretary stated the following:

"The spread is largely due to households meeting and not abiding to social distancing. So from midnight tonight, people from different households will not be allowed to meet each other indoors in these areas.

Greater Manchester

Blackburn with Darwen

Burnley

Hyndburn

Pendle

Rossendale

Bradford

Calderdale

Kirklees

The same restrictions will apply to the City of Leicester"

In fact, SI 828/2020 was not published at all until 4th August 2020. Accordingly, in issuing the Guidance on 31st July the Secretary of State acted outwith his powers contrary to the provisions of section 3 of the Statutory Instruments Act 1946 and the Guidance was ultra vires. Similarly, in publishing the said Tweet the Health Secretary personally and falsely informed the public that there would be legal restrictions on social distancing in the North West of England from that time when in fact there were none. Accordingly, the Secretary of State wilfully misconducted himself to such a degree as to amount to an abuse of the public's trust in him without reasonable excuse or justification.

In particular, by Section 3 (2) of the 1946 Act any person subject to enforcement, fixed penalty or prosecution for a purported breach of the non-existent Regulations prior to 5th August 2020 has an absolute defence to the same.

SI 828/2020 was not made until 9 am on 4th August 2020 or laid before Parliament until 12.30 pm that same day. Accordingly, the Secretary of State for Health wrongly-exercised his discretion under Section 45R of the 1984 Act in making the instrument without a draft having been laid before and approved by a resolution of each House of Parliament when there was no urgency to do so.

8 The details of the action that the defendant is expected to take

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That the Government do repeal or amend those sections of the Act complained of to ensure that it does not interfere with the stated Convention Rights.

That the Secretaries of State do rescind those parts of the Regulations complained of. Further or alternatively, that the Secretaries of State make alternative Regulations pursuant to the Civil Contingencies Act 2004 which are rational and do not interfere with the stated Convention Rights.

In respect of the North of England Regulations, that the Health Secretary announces that any enforcement action taken against any person prior to 5th August 2020 under what are now Regulations 8 to 11 inclusive is void and a nullity.

9 ADR proposals

Not appropriate.

10 The details of any information sought

Minutes of every SAGE meeting held since the 46th meeting on 9th July 2020.

The SAGE 42 meeting minutes.

The EMG review of advice on Covid-19 airborne transmission risks in light of new evidence, data and medical input: this review to consider face coverings, school and university settings, and winter challenges, and which was to have been produced by 16th July 2020.

Minutes of all SPI-B, SPI-M and NERVTAG meetings from 1st July 2019 to date, full and un-redacted.

Statistics showing the daily additional COVID-19 associated deaths by date reported and daily number of lab-confirmed cases by specimen date for the region covered by SI 828/2020 from 23rd March 2020 to date.

11 The details of any documents that are considered relevant and necessary

Minutes of every SAGE meeting held since the 46th meeting on 9th July 2020.

The SAGE 42 meeting minutes.

The EMG review of advice on Covid-19 airborne transmission risks in light of new evidence, data and medical input: this review to consider face coverings, school and university settings, and winter challenges, and which was to have been produced by 16th July 2020.

Minutes of all SPI-B, SPI-M and NERVTAG meetings from 1st July 2019 to date, full and un-redacted.

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Statistics showing the daily additional COVID-19 associated deaths by date reported and daily number of lab-confirmed cases by specimen date for the region covered by SI 828/2020 from 23rd March 2020 to date.

12 The address for reply and service of court documents

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Essex CM5 0QP

13 Proposed reply date

A response is expected by Friday, 21st August 2020 being 14 days from the posting date of this Protocol letter. If a reply can be made earlier than the 14 days specified in the Protocol that would be welcomed as the matter is and remains urgent.

Yours faithfully

Tilbrook's