

# THE HIGH COURT

## NOTICE OF MOTION

RECORD NO. 2022/1456 P

BETWEEN: David Egan and Sharon Browne

PLAINTIFF/APPLICANT

and

Stephen Donnelly, Michael Martin, Dr. Tony Holohan and Paul Reid

DEFENDANT/RESPONDENT

Take notice that on      d ay the      day of      , 202\_ at the hour of 11. o'clock in the forenoon, the Plaintiff, David Egan will apply to the of this Honourable Court for an order

**(1) A Protective Costs Order** as this case is being taken in the Public Interest and for the purpose of serving the Common Good. And that such an Order will mean that the Plaintiff and Defendant will not be liable for paying the legal costs of the opposing side. The case is of the utmost national importance and involves the issue of deaths and serious injuries, illnesses or disabilities for children in Ireland caused by an experimental covid19 vaccine and that the taking of such a case is in the public interest and for the Common Good. The accountability of the Irish government and its health services to the Irish people is set down in the Irish Constitution, and this court case involves this accountability. Issues of life and death and of serious illnesses or disabilities caused by government actions of those of it's agents are of great importance to the people of Ireland as defined in the Irish Constitution and who have the final say in matters of national importance. This case involves issues of great national importance, the Public Interest and the Common Good, and it needs to be heard in Irish courts and should not be blocked or impeded by prohibitive costs.

Protective Costs Orders have been granted in Ireland, Britain and EU countries for these type of Public Interest cases in the past, and there is also provision in the Superior Court rules for this, and also provision in the Aarhus Convention for this in respect of risks to the environment and humans living in it and the precautionary principles, and provisions under Articles 6 and 13 in the European Convention on Human Rights give one a right to due process, fair procedure, and litigation rights on issues of importance to human rights, the Public Interest and the Common Good. And that a Protective Costs Order be granted by

the HIGH COURT before the case proceeds and before injunction request is sought and heard by the court.

**(2) An Emergency Injunction of the High Court** to restrain the Defendants, their servants and/or agents and/or employees, from administering covid19 vaccines and boosters to children aged from 5 to 11 years old until such time as full information about

**(i)** risks, deaths, injuries, illnesses and disabilities caused by these vaccines to children as found in government reports worldwide and published scientific studies, and expert scientific and medical opinion worldwide, and official statistics worldwide is given by the government, the HSE, NPHET, RTE and the Irish press and media to parents and guardians

**(ii)** lack of effectiveness of these vaccines as found in government reports worldwide and published scientific studies, expert scientific and medical opinion worldwide, and official statistics worldwide is given by the government, the HSE, NPHET, RTE and the Irish press and media to parents and guardians.

**(iii)** the fact that no children in Ireland died from covid19 according to the CSO, and children have strong natural immunity against covid19 according to scientists and doctors. Most children have had covid19 and recovered quickly and are naturally immune to it. The scientific evidence clearly shows that natural immunity to covid19 is far superior to vaccine induced immunity and we can provide this evidence to the court. There is no urgent or desperate need to give covid19 vaccinations to children.

so that the Full and Valid Informed Consent of parents and guardians can be given by the parents or guardians, as required under Irish laws, the Irish Constitution and EU laws and international laws and treaties. At present, full and informed consent is not being given by parents as they are not being informed about deaths, illnesses and disabilities caused by the covid19 vaccines in Ireland and worldwide.

Wherein said application will be grounded upon the proceedings and pleadings had herein this Notice of Motion, the grounding affidavit of David Egan sworn on the 12<sup>th</sup> September 2022 the nature of the case and the reasons to be offered.

Dated the

Signed:

Signed-Address

To: Chief-Registrar Central Office High Court

Four Courts

Dublin 7