



This case is being handled by attorney Mr. Drs. A.G.W. van Kessel of the law firm Van Kessel Advocatuur, with offices in Leeuwarden (8938 AG) at Orionweg 47E as well as by attorney Mr. P.W.H. Stassen, affiliated with the law firm Stassen & Kemps advocaten in (5611 CV) Eindhoven at Nachtegaallaan 6;

Application for preliminary evidence proceedings

(ex art. 196 e.v. Rv)

At the Court of Northern Netherlands, Leeuwarden location

Give respectfully

- I. [REDACTED] residing in Leeuwarden,
- II. [REDACTED], residing in Brunssum,
- III. [REDACTED], residing in Leeuwarden,

for whom this request is submitted in writing by the litigation lawyers Mrs. A.G.W. van Kessel and P.W.H. Stassen, in these proceedings with offices at the respective office addresses mentioned above.

Introduction

1. The applicants are considering intervening in civil substantive proceedings pending before your court and wish to have preliminary evidence taken in advance in the form of recording statements from renowned scientists. These civil substantive proceedings concern the case with roll number 23/172. This case focuses on the claimants' position that Covid-19 is not a disease but a project, namely Covid-19: the Great Reset. The claimants' position in those proceedings is that the Covid-19 (mRNA) injections are a crucial part of this project. The applicants have closely followed these proceedings, are themselves victims of the Covid-19 (mRNA) injections and see that the proceedings are increasingly focusing on the question of whether or not the Covid-19 (mRNA) injections are a bioweapon with which genocide is committed. An evidentiary determination on this point is crucial for the applicants in order to decide to intervene in the substantive proceedings with their own claim.
2. In this way, applicants aim to better assess their chances in any subsequent proceedings brought before the civil court, or to prevent evidence from being lost (due to the possible departure or death of a witness to be heard).
3. With the provisional evidence, the applicants wish to obtain clarification on the relevant facts relating to the core of the legal proceedings they may initiate. The



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procedural documents in the main proceedings show that the opposing parties dispute the statements that are crucial to the applicants, which gives them a legitimate interest in securing their evidence by hearing the experts to be put forward in this application under oath.

4. In 2021, under great social pressure and in violation of Article 7 in conjunction with Article 4 paragraph 2 of the International Covenant on Civil and Political Rights (ICCPR), the applicants were vaccinated in the Netherlands by the Municipal Health Service (GGD) with Covid-19 (mRNA) injections. Shortly after administration of the second dose of Covid-19 (mRNA) injections, the applicants developed serious side effects resulting in serious physical injury.
5. Prior to having the Covid-19 (mRNA) injections in 2021, the applicants were healthy people without any medical complaints. The serious medical complaints arose after having the Covid-19 (mRNA) injections, this being the only change in the applicants' lives. The applicants are of the opinion that the serious side effects that occurred after having the Covid-19 (mRNA) injections are the direct result of the content / composition of these Covid-19 (mRNA) injections, which were injected into their bodies by the GGD employees. The applicants have submitted their serious medical complaints to regular healthcare, namely general practitioners and medical specialists. Any causal link between having the Covid-19 (mRNA) injections and the serious physical injuries that occurred afterwards is denied by these doctors. The position of the applicants is not essentially different from that of the claimants in the aforementioned substantive proceedings, which means that it is reasonable for the applicants to intervene in these proceedings or to institute their own claim against the opposing parties in new proceedings before your court.
6. The applicants then conducted their own research on the basis that the only change in their healthy living situations was the Covid-19 (mRNA) injections. The applicants soon came into contact with many people who also suffered serious injuries after having the Covid-19 (mRNA) injections. The doctors in their case also denied that their injuries were the result of the Covid-19 (mRNA) injections. From research conducted by the applicants themselves, the applicants conclude that the Covid-19 (mRNA) 'vaccinations' are not safe and effective and cannot be defined as vaccines. According to the applicants, the Covid-19 (mRNA) injections are gene therapy that has never before been tested on a large scale on humans. The applicants therefore claim that they unknowingly participated in a life-threatening experiment without being informed and without their express consent pursuant to Article 7 in conjunction with Article 4 paragraph 2 ICCPR. The applicants have been seriously misled and completely misled by the various 'vaccine pushers'. However, the applicants themselves are not experts and in that sense their own analyses and



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findings carry only limited legal weight. The experts put forward in this application are, as will be explained below, eminently capable of making a well-founded expert opinion and, unlike the applicants themselves, have acquired relevant scientific knowledge and experience at an exceptionally high level in the sectors and sciences relevant to the facts to be proven by the applicants. In addition, the questions at issue are also of great social importance. For these reasons, there is a very great and legally respectable interest in granting the present application.

7. The applicants are closely following the aforementioned substantive proceedings by taking note of the publications of the procedural documents on the website of the RechtOprecht foundation (www.rechtoprecht.online). This shows that the opposing parties dispute that there is a Great Reset and, in extension of this, dispute that the Covid-19 (mRNA) injections play a crucial role in a Great Reset. Furthermore, the opposing parties state that the Covid-19 (mRNA) injections can be regarded as safe and effective vaccines. The opposing parties strongly dispute that there is genocide.
8. The applicants believe that the questions of whether there is a Great Reset and whether the Covid-19 (mRNA) injections as part of it can be qualified as a bioweapon and whether genocide is being committed with it, are the most crucial questions that must be answered in order to find the truth. The answers to these questions are of great importance to the applicants for the chances of success of a procedure they will initiate on the one hand and their motivation to initiate a procedure on the other.
9. If the Covid-19 (mRNA) injections administered to the applicants under the influence of a deliberately misrepresented fact (a false narrative) and under social pressure caused by this false narrative and in violation of Article 7 in conjunction with Article 4 paragraph 2 ICCPR do not appear to be vaccines in the context of public health, but that these injections appear to have been developed as a bioweapon with the primary aim of medically harming the applicants and in fact the (world) population, respectively reducing life expectancy in humans, then there is only one possible conclusion, namely that there has been a deliberate, organised group commission of an unlawful act against the applicants and in fact against the entire (world) population. In that case, there is genocide.
10. The applicants intend to claim damages for all material and immaterial damage already suffered and yet to be suffered by them as a result of the manner in which they were misled by the other parties and the Covid-19 (mRNA) injections administered to them as a result.
11. Finally, with regard to the interest in the evidence, the applicants point out the



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following. One of the renowned experts who, at the request of the applicants, declared himself prepared to make a statement on the questions to be formulated below was Mr. Dr. Francis A. Boyle. He was an expert in the field of regulations concerning bioweapons. He left no doubt that the Covid-19 (mRNA) injections are a bioweapon. Mr. Boyle was 74 years old and fully active as a teaching professor, among other things. As far as is known, his health left nothing to be desired. Within three weeks of his written agreement to make a statement in these proceedings, he suddenly died on 30 January 2025. No explanation has been made known for his unexpected sudden death. There are only a few experts like Mr. Boyle who are extensively specialized in the field of bioweapons. This shows and makes it even more so that evidence must be secured as quickly as possible.

12. The experts nominated by the applicants appear to be the only experts worldwide who can further substantiate and explain Mr Boyle's position and answer the questions formulated in this application.

Concise description of the dispute

13. If the evidence does indeed lead to legal and convincing proof that the Covid-19 (mRNA) injections are a bioweapon that is used to commit genocide, the applicants will claim damages from the respondents (who are also defendants in the aforementioned substantive proceedings) and also request a declaration that the defendants have acted unlawfully towards them by deploying a bioweapon against them and concealing its deployment by promoting this bioweapon as a 'safe and effective vaccine'.

Nature and course of the claim

14. The claims of the applicants, as indicated above, are aimed at compensation for damages on the grounds of an unlawful act and at obtaining a declaration of law. In accordance with the arguments in the main proceedings, this concerns an unlawful act committed by the defendants as a group, for which the defendants are jointly and severally liable. All procedural documents from the main proceedings are known to your court and the opposing parties, for which reason they are not submitted again in this request. The applicants adopt the arguments of the plaintiffs in the main proceedings as their own.

Name and place of residence of the counterparties

15. The request is directed against the following counterparties.

(government officials)

1. Mr. EVERHARDUS ITE HOFSTRA, residing in [REDACTED];
2. Mr. JAAP TAMINO VAN DISSEL, residing in [REDACTED];
3. Ms. MARIA PETRONELLA GERARDA KOOPMANS, residing in [REDACTED];
4. Mr. MARK RUTTE, residing in [REDACTED];
5. Ms. SIGRID AGNES MARIA KAAG, residing in [REDACTED] (ZH);
6. Mr. HUGO MATTHEÛS DE JONGE, residing in [REDACTED];
7. Mr. ERNST JOHAN KUIPERS, residing in [REDACTED];
8. Mr. DIEDERIK ANTONIUS MARIA PAULUS JOHANNES GOMMERS, residing in [REDACTED];
9. Mr. WOPKE BASTIAAN HOEKSTRA, residing in [REDACTED];
10. Ms. CORNELIA VAN NIEUWENHUIZEN, living at a secret address;

Attorneys: mr. R.W. Veldhuis and mr. M.E.A. Möhring

(pharmaceutical industry)



11. Mr. ALBERT BOURLA, residing in [REDACTED], United States of America ;
Attorney: mr. D. Roessingh

(mass media)

12. Ms. GISELLE JACQUELINE MARIE-THÉRÈSE VAN CANN, residing in [REDACTED];

13. Mr. PAUL JANSEN, living without a known place of residence or abode;
Attorney: mr. L. Broers

(non-governmental organization (NGO, WEF))

14. Mr. FEIKE SIJBESMA, residing in [REDACTED];
Attorneys: mr. R.W. Veldhuis and mr. M.E.A. Möhring.

15. Mr. WILLIAM HENRY BILL GATES III, residing in [REDACTED], United States of America.

Attorney: mr. W.H. Heemskerk

(semi-government)

16. Mrs. AGNES CATHARINA VAN DER VOORT-KANT, living without a known place of residence or abode;

Attorney: mr. A.H. Ekker

(government)

17. The STATE OF THE NETHERLANDS, a public law legal entity, located in The Hague ("the State") and established at (2511 CB) The Hague at Korte Voorhout 8;

Attorneys: mr. R.W. Veldhuis and mr. M.E.A. Möhring

All defendants can be reached and summoned via the lawyers designated above, whose contact details are known to your court in connection with the aforementioned substantive proceedings.



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Nature of the evidentiary proceedings requested

16. The applicants request, as indicated, an examination of experts. The questions on which the opinion of these experts is requested are tailored to the expertise of the experts in question as this expertise is evident from his or her curriculum vitae. The experts that the applicants request your court to hear and the questions to be asked in this regard are as follows. All the aforementioned experts have declared themselves willing to cooperate in an expert report to be ordered by your court. The practical course of events that the applicants and the experts advocate in this regard is that they are heard before the judge and the parties (expert examination) and, if necessary, submit a further written report (expert report). Hearing these experts under oath is a necessity for the evidence provided by the applicants because these experts can also be regarded as witnesses and their relevant factual knowledge also (partly) consists of their observations as witnesses. In view of this, it is of great importance that these witnesses/experts answer the aforementioned questions under oath before your court and the parties.

The names and places of residence of the persons whom the applicants wish to hear as witnesses/experts.

17. The applicants wish to have the following five persons heard as witnesses/experts before your court.

(1) **Mrs Catherine Austin Fitts**, resident in the Netherlands. Mrs Fitts is an American economist, investment banker and former civil servant who was a director of Dillon, Read & Co. and, during the presidency of George H.W. Bush, worked at the United States Department of Housing and Urban Development in the position of Assistant Secretary of Housing - Federal Housing Commissioner. Her experience and expertise therefore lie primarily in the field of being able to interpret and explain macro-economic and macro-political developments. Mrs Fitts' CV is submitted as Appendix 1. As such, this expert has the necessary qualities to report on research conducted by the expert and/or research yet to be conducted and, on the basis thereof, to answer the questions to be formulated below (expert hearing) and, if requested by the parties and/or the court, to provide a (further) report on this matter (expert report).



1. Is there a Great Reset going on in the world?
2. If so, what does this Great Reset entail?
3. What do you think are the main reasons and/or causes of this Great Reset?
4. Who are the initiators of the Great Reset?
5. Who are the executors of the Great Reset?
6. What does this Great Reset lead to?
7. Are the Covid-19 (mRNA) injections related to the Great Reset? If so, what is the connection?

(2) **Mr. Dr. Mike Yeadon**, resident in Ireland. Dr. Yeadon is a retired scientific researcher, specialized in the development of medicines and vaccines and former vice president of the pharmaceutical giant Pfizer Inc. For his references, please refer to his CV (Appendix 2). As such, this expert has the necessary qualities to report on research conducted by the expert and/or research yet to be conducted and, on the basis thereof, to answer the questions to be formulated below (expert hearing) and, if requested by the parties and/or the court, to provide a (further) report on this matter (expert report).

1. Is Covid-19 a new disease?
2. Does the disease Covid-19 exist? If so, what is its cause and what are its characteristics?
3. Has there been a Covid-19 pandemic?
4. By whom and for what purpose were the Covid-19 (mRNA) injections developed?
5. What choices are included in the development process and the resulting design of the Covid-19 (mRNA) injections? What are the implications of these choices and this design in terms of the degree of safety and effectiveness?
6. Are the Covid-19 (mRNA) injections safe and effective?
7. Are the Covid-19 (mRNA) injections suitable for use in the context of combating a pandemic of any kind?
8. Do the Covid-19 (mRNA) injections qualify as bioweapons?
9. Does the use of Covid-19 (mRNA) injections constitute genocide?

- (3) **Mevrouw Alexandra Latypova Mba**, residing in Nevada - USA. Ms. Latypova is a specialist in the medical device sector for the pharmaceutical R&D industry. She is (co-)founder of a number of companies in which Pfizer was on board as an investor and in which a multi-year Research & Development collaboration took place between those companies and Pfizer. As a result, she worked for many years for more than sixty leading companies in the pharmaceutical industry in the field of Research & Development. Her specialization is drug safety, with a specific focus on cardiovascular safety assessments. Ms. Latypova regularly contacted the regulatory authorities of FDA, EMA and the Japanese FDA on behalf of Pfizer regarding the market admission of newly developed drugs. For her references, please refer to her CV (Appendix 3). As such, this expert has the necessary qualities to report on research conducted by the expert and/or research yet to be conducted and, on the basis thereof, to answer the questions to be formulated below (expert hearing) and, if requested by the parties and/or the court, to provide a (further) report on this (expert report).
1. Can mRNA/DNA technology be used as a bioweapon?
 2. Have Covid-19 mRNA injections been marketed as regulated medical products?
 3. Are there legal requirements under US law for the use of scientifically validated substances and methods for the purpose of promoting (Covid-19) mRNA injections as safe and effective?
 4. When the Covid-19 mRNA injections were administered to millions of people in the European Union, did these injections meet the requirements and guarantees that consumers may expect from pharmaceutical products?
 5. Were the Covid-19 mRNA injections purchased, financed, delivered and administered as pharmaceutical products in accordance with the safety guarantees that a consumer may expect?
 6. Were the Covid-19 mRNA injections falsely promoted by falsely labeling them? Can the Covid-19 mRNA injections be qualified as bioweapons?



7. Did individuals who prescribed, purchased and/or administered the Covid-19 (mRNA) injections participate in war crimes and/or genocide?

(4) **Mevrouw Katherine Watt**, residing in Pennsylvania USA. Ms. Watt is trained as a paralegal and active as a researcher. For her references, please refer to her CV (Appendix 4). As such, this expert has the necessary qualities to report on research conducted by the expert and/or research yet to be conducted and, on the basis thereof, to answer the questions to be formulated below (expert hearing) and, if requested by the parties and/or the court, to provide a (further) report on this (expert report).

1. What are the legal frameworks governing the development, production, labeling, distribution, and use of viruses and vaccines under U.S. law?
2. What are the legal frameworks governing the research, development, transfer, and deployment of biological and bacteriological weapons under U.S. law?
3. On what basis are viruses, vaccines, gene therapy, and other biological products distinguished from biological and bacteriological weapons under U.S. law?
4. Are there legal requirements under U.S. law for the use of scientifically validated substances and methods for the purpose of promoting viruses, vaccines, gene therapy, and other biological products as safe and effective?
5. What is the relationship between the regulatory functions and decisions of the U.S. Food and Drug Administration (US-FDA) regarding international trade in viruses, gene therapies, and other biological products, and other regulatory authorities outside the United States, particularly in Europe?
6. Did individuals who prescribed, purchased and/or administered the Covid-19 (mRNA) injections participate in war crimes and/or genocide?



(5) Dr. Joseph Sansone B.A. – M.S., residing in Florida - USA.

Dr. Sansone is a psychotherapist specializing in clinical hypnosis and holds a B.A. in Psychology, an M.S. in Clinical Mental Health, and a PhD in Psychology with a Transpersonal concentration. Dr. Sansone has collaborated with Professor Francis A. Boyle since 2021 in conducting research into the official Covid-19 narrative. For his references, please refer to his CV (Appendix 5). As such, this expert has the necessary qualities to report on research conducted by the expert and/or research yet to be conducted and, on this basis, to answer the questions to be formulated below (expert hearing) and, if requested by the parties and/or the court, to provide a (further) report on this (expert report).

1. By whom and for what purpose were the Covid-19 (mRNA) injections developed?
2. What can you state under oath about Mr. Boyle's research results and their scientific validation?
3. Has Mr. Boyle reported on his research results? If so, how can these results be consulted?
4. Are the Covid-19 (mRNA) injections safe and effective?
5. Do the Covid-19 (mRNA) injections qualify as bioweapons?
6. Was the development and/or administration of the Covid-19 (mRNA) injections a military project?
7. Are the Covid-19 (mRNA) injections committing genocide?

Relative jurisdiction of the court

18. In accordance with Article 187 paragraph 1 of the Code of Civil Procedure, the court where the substantive proceedings are likely to be initiated has jurisdiction. A substantive case is currently pending before the District Court of Noord-Nederland, Leeuwarden location, by seven claimants as victims of the Covid-19 (mRNA) injections against the State of the Netherlands, all ministries and several private individuals.
19. The applicants have a legitimate interest in instituting a claim after the considerations from the preliminary witness hearings in order to be allowed to join or intervene in this pending substantive case. The applicants are of the opinion that the judge of the court of Noord-Nederland location Leeuwarden has relative jurisdiction in this application to hear their requests.

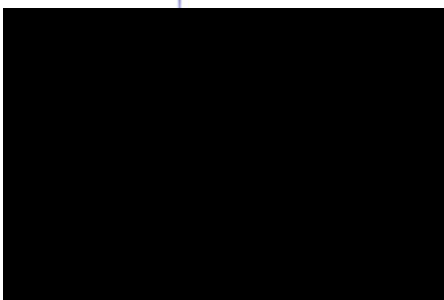
Reasons why

applicants turn to your Court with the request

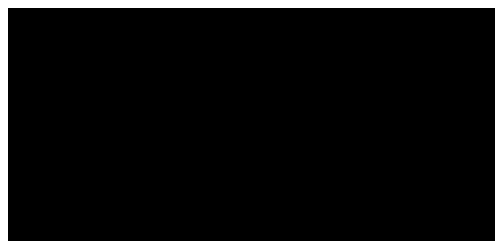
- to hold a hearing in the aforementioned facts and questions by order, at which the experts designated above can be questioned in response to the questions formulated above;
- with the stipulation that the party experts can be heard in public by the examining magistrate, if they so wish, by means of a video connection with the court,
- with the stipulation of the day, time and place on which these hearings will take place in public, taking into account the different time zones,
- with the designation of the examining magistrate before whom the hearing will be held, and furthermore
- with the stipulation of the day on which the applicants must send a copy of this petition and the decision to be made thereon to the seven party experts at the latest.

Leeuwarden, 7. March 2025

Attorneys



mr. A.G.W. van Kessel



mr. P.W.H. Stassen