This case is being handled by attorney P.W.H. Stassen, affiliated with the law firm Stassen & Kemps Advocaten in (5611 CV) Eindhoven at Nachtegaallaan 6.

Notice of appeal
also containing a request for interim relief analogous to Article 223 of the Code of Civil Procedure.

against the decision of 20 August 2025 rendered by the District Court of Noord-Nederland with case number / request number: C/17/199273 / HA RK 25-17 (breaking the ban on legal remedies under Article 200 of the Code of Civil Procedure).

At the Arnhem-Leeuwarden Court of Appeal
in Leeuwarden

The applicants in appeal are:

1. Mr. [redacted] living in Leeuwarden,
2. Mrs. [redacted], living in Brunssum,
3. Mr. [redacted], living in Leeuwarden,

who all choose residence at the office address of Stassen & Kemps attorneys at law at Nachtegaallaan 6 in (5611 CV) Eindhoven, from which office Mr. P.W.H. Stassen is the attorney in this case,

In the first instance of these proceedings the defendant was represented by a lawyer who appeared after having been summoned and/or requested to do so by the court:

1. Mr. **EVERHARDUS ITE HOFSTRA**, living in [redacted];
2. Mr. **JAAP TAMINO VAN DISSEL**, living in [redacted];
3. Mrs. **MARIA PETRONELLA GERARDA KOOPMANS**, living in [redacted], municipality [redacted];
4. Mr. **MARK RUTTE**, living in [redacted];
5. Mrs. **SIGRID AGNES MARIA KAAG**, living in [redacted];
6. Mr. **HUGO MATTHEÜS DE JONGE**, living in [redacted];
7. Mr. **ERNST JOHAN KUIPERS**, living in [redacted];
8. Mr. **DIEDERIK ANTONIUS MARIA PAULUS JOHANNES GOMMERS**, living in [redacted];
9. Mr. **WOPKE BASTIAAN HOEKSTRA**, living in [redacted], municipality [redacted];
10. **CORNELIA VAN NIEUWENHUIZEN**, living at a secret address;
14. Mr. **FEIKE SIJBESMA**, living in [redacted]

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

The defendants listed above, according to their statement of defense, provisional expert hearing dated June 24, 2025, all chose domicile in The Hague at the office of their lawyers Mr. R.W. Veldhuis and Mr. M.E.A. Möhring, affiliated with the law firm Pels Rijcken, located in New Babylon at Bezuidenhoutseweg 57, (2594 AC) The Hague.

11. Mr. ALBERT BOURLA, residing in [redacted], United States of America

Respondent 11 was assisted in the first instance by his lawyers, Mr. D.C. Roessingh and Mr. M. Bredenoord-Spoek, attorneys affiliated with the DE BRAUW BLACKSTONE WESTBROEK office, located at Burgerweeshuispad 201, 1076 GR Amsterdam..

12. Mr. **GISELLE JACQUELINE MARIE-THÉRÈSE VAN CANN**, living in [redacted];

13. Mr. **PAUL EDWIN JANSEN**, living in [redacted];

Respondents 12 and 13 were both assisted in the first instance by attorney R.H.W. Lamme, affiliated with the law firm AC&R, located at Keizersgracht 212 in (1016 DX) Amsterdam.

15. Mr. **WILLIAM HENRY BILL GATES III**, living in [redacted], Verenigde Staten van Amerika.

Respondent 15 was assisted in the first instance by lawyers Mr. W.H. Heemskerk and Mr. P.F.B. Mulder, affiliated with the law firm Pels Rijcken, located in New Babylon at Bezuidenhoutseweg 57, (2594 AC) The Hague.

16. Mrs. **AGNES CATHARINA VAN DER VOORT-KANT**, without known place of residence.

Respondents sub 16., according to their statement of defense dated July 3, 2025, chose their domicile at the office of their lawyer, Mr. A.H. Ekker, affiliated with the law firm Ekker Advocatuur, with offices at Panamalaan 6G in (1019 AZ) Amsterdam

Appeal

1. By this application, the applicants appeal against the decision of 20 August 2025 rendered by the District Court of Noord-Nederland with case number / application number: C/17/199273 / HA RK 25-17, as well as against the procedural decisions taken prior to that decision regarding the publicity of the oral hearing and the denial to the public and 'non-accredited journalists' of the opportunity to make images and sound recordings of the hearing.

Procedural documents in first instance

2. The documents in the proceedings at first instance include the following.

   (1) The letter dated March 7, 2025, by which the petition was submitted and which includes:

"... Several important observations are appropriate regarding the submission of this request.

This request is of great public importance because, if granted, legal and convincing evidence will be provided by the witnesses/experts submitted in the request regarding
(among other things) the following questions:

1. Whether the Covid-19 mRNA injections, which the respondents claim are safe and effective, qualify as bioweapons currently being used to commit genocide;
2. Whether a Great Reset (which the respondents dismiss as only a possible future scenario) is underway and what this means.

As indicated in the request, the applicants' own research leads to an affirmative answer to these questions. However, the applicants do not have the knowledge, experience, and scientific standing to weigh their own findings sufficiently in the legal system to assess their evidentiary position and arrive at a balanced legal judgment. Precisely for this reason, hearing the experts nominated in the petition is necessary for them.

The experts nominated in the request have no vested interests in any of the applicants and/or respondents and, given their training, experience, and relevant expertise, are particularly well-suited to provide an independent

and scientifically sound expert opinion on the questions addressed to them in the request.

Given the significant public interest in the subject of this request, and also considering the reputation of the nominated experts and their scientific knowledge, experience, and integrity, the handling of this request and the hearing of the experts can be expected to receive considerable international media attention.

The nominated experts are all willing and able to be heard by your court very soon. Given the public interest in their expert opinions on the questions to be put to them, your court is strongly requested to proceed with the handling of this request and the hearing of the experts without delay…'

(2) The petition with appendices 1, 3, 4 and 5 (CVs of nominated experts)

(3) the email dated May 21, 2025, from the applicants containing the CV of Dr. Mike Yeadon, which is referred to in the application as Appendix 2

(4) the letter dated 16 June 2025 from the applicants with productions. In this letter the applicants stated:

'… It is of the utmost importance that the scheduled hearing for the application proceeds and that the nominated experts/witnesses are heard as soon as possible…' The productions accompanying this letter concern:

(1) A copy of the reply, also containing a statement of claim increase filed in other proceedings. This other procedure concerns the summons proceedings (substantive proceedings) mentioned in the petition, also pending before your court (case number: C/17/190788 / HA ZA 23-172);

(2) An overview of productions pertaining to the reply, also containing a statement of increase in the claim as referred to in (1);

(3) A USB stick containing the productions pertaining to the reply, also containing the deed of increase of claim as referred to in (1) and (2).

and in which letter, for the benefit of the judge hearing the case, it was pointed out that all documents relating to the application and the summons case with case number: C/17/190788 / HA ZA 23-172 are made publicly accessible via the website of the RechtOprecht foundation and can therefore be consulted via www.rechtoprecht.online.

(5) the statement of defense from the side of respondents 1 to 10 and 14

(6) the email from the side of defendant sub 11 dated July 2, 2025 requesting to participate digitally in the hearing with a letter attached

(7) The court's decision of July 3, 2025, rejecting the request of defendant 11. The applicants are not aware of a written decision on this matter. The applicants refer to an email from Van Cann and Jansen's lawyer, which mentions a telephone conversation between the lawyer and the court in which it was stated that a hybrid hearing is not possible for technical reasons..

(8) the statement of defense on behalf of defendant sub 11

(9) the email from the side of defendant sub 15. dated July 4, 2025, in which it is indicated that defendant sub 15. refers

(10) the statement of defense on behalf of defendant sub 16.

(11) the email from respondents 12 and 13 dated July 4, 2025, indicating that oral defense will be conducted

(12) the July 6, 2025, email from the applicants containing requests to the court and a link to a video of Mike Yeadon (video now attached on appeal on USB)

(13) the letter from the court dated 7 July 2025, in which a decision was made on those requests (referred to in the order as the letter of 6 July 2025))

(14) the court's email of July 8, 2025, requesting parties to respond to journalists' request to take photographs and make audio and video recordings at the hearing

(15) email from the court dated 8 July 2025 at 2:01 p.m. in which the parties were informed of the decision that non-accredited journalists are not allowed to take photographs and take visual and audio recordings, including the defendants' prior reactions.

(16) the email from the applicants dated 8 July 2025 at 5:53 p.m., in which an objection is raised against the decision to apply any form of censorship.

(17) the oral hearing, of which the court clerk took notes. The court notes are not in the possession of the applicants' lawyer. Reference is made to the audio recording made available by the court, the content of which has been partially censored by beeping out names and distorting the voices of the respondents' lawyers. This audio recording has been placed on an attached USB drive.

(18) the pleadings of the applicants

(19) the pleadings of the defendants 1 to 10 and 14

(20) the pleadings of respondents 12 and 13

(21) the order of the court dated 20 August 2025, which is the subject of an appeal.

Reading guide

3. The applicants maintain all their arguments and submitted evidence/exhibitions in the first instance and request that these be considered repeated and incorporated herein to further explain the grounds for appeal to be formulated below. What is stated in explanation of a ground for appeal also serves to explain all other grounds for appeal. Due to the size and nature of the documents and files submitted by the applicants (videos, very extensive documents, digitally exceeding five gigabytes), a USB drive containing all documents and files from these proceedings in the first instance and on appeal is attached to this notice of appeal. All documents from the first instance are attached to this application and separated by numbered tab sheets with a party designation and description. Regarding the exhibits on appeal, these are also attached, with the understanding that the very extensive documents from the first instance (which the respondents already possess), the appendices to Sasha Latypova's expert opinion (over one gigabyte), and the video

of Dr. Masayasy Inoue, Professor Emeritus of Osaka City University Medical School, are placed on the attached USB stick.

General grievance

The facts established by the court in relation to the admissibility of this request at first instance and on appeal (breaking the ban on appeal), also a general grievance.

4. The applicants note that the order does not include the full contents of the case file. In particular, the court wrongly omitted the letter of submission of the order and its contents. This letter, dated March 7, 2025, leaves no ambiguity regarding the context of the request and its public importance, the need to consider the significant (international) media attention, and the independence of the experts, making it perfectly clear that the designation as party expert meant nothing more than that the experts were nominated by the applicants. In the applicants' opinion, the audio recording made and available by the court also belongs to the case file.

5. The applicants disagree with the presentation of the facts contained in the decision under appeal under paragraph 2.2. While this is a summary of the arguments presented in the petition, it wrongly disregards the seriousness of the case – a violation of virtually all human rights – and further factual explanations presented on behalf of the respondents, which were part of the procedural debate. The defense on behalf of the respondents – with the exception of Bill Gates – was explained by their lawyers through a complete denial of the human rights violations and crimes alleged by the applicants. The respondents' defense amounts to a glorification of the official government narrative regarding COVID-19, according to which millions of people were supposedly saved (partly) by the respondents through COVID-19 injections and measures. The court wrongly omitted a word in its decision to address the public interest repeatedly stated and declared by the applicants in their request, which would clarify the causes of the aforementioned contradiction.

6. In the submitted reply and video by Mike Yeadon, which form part of the proceedings, and in paragraphs 12, 13, and 17 of the applicants' notes submitted at the hearing, it was made perfectly clear that the question before the court boils down to whether the most organized violation of human rights has occurred. The court should not have assessed the application in isolation from this context, as will be

further explained below in addition to what the applicants already stated on this matter at first instance.

7. Regarding this context, explicit reference is also made to the summons dated July 14, 2023, in the substantive proceedings pending between the other parties. This summons, including exhibits, is submitted as exhibit 1. The complete file in the relevant proceedings can be consulted at www.rechtoprecht.online. The increased claim is submitted as exhibit 2, which expresses in the increased claim that the requested declaratory judgment pertains to the period up to the date that judgment is rendered in the relevant proceedings. As executors of the Covid-19: The Great Reset project, the defendants continue the Covid-19 project, as evidenced by the fact that they continue to propagate the official Covid-19 narrative, even though this is demonstrably false and the Covid-19 injections are classified as a bioweapon.

8. European law applies (among other things) to the proceedings at first instance and currently on appeal. The district court failed to recognize this. The Court of Appeal is hereby referred to the following provisions.

Article 6 ECHR – right to a fair trial

1. In the determination of his civil rights and obligations or of any criminal charge against him, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law. The judgment shall be pronounced publicly, but the press and the public may be denied access to the courtroom throughout or part of the trial in the interests of morality, public order or national security in a democratic society, where the interests of minors or the protection of the privacy of the parties to the proceedings so require, or to the extent strictly necessary by the court in special circumstances where publicity would prejudice the interests of justice.

9. The right to a fair trial enshrined in Article 6 of the ECHR was seriously violated by the court of first instance. This is as follows. The applicants' trial was not public within the meaning of Article 6 of the ECHR because the doors of the court and the courtroom were closed to the public, while the majority of the large public present were denied access to the courthouse and the courtroom and thus could not witness the proceedings. It is shocking that the court made its decision regarding the application of censorship without considering the reaction of the applicants' lawyer, which constitutes a serious violation

of the principle of audi alteram partem. Reference is made in this regard to the dates of the correspondence on this matter, dated July 8, 2025, and the date of the decision, as stated in the introduction to this appeal. There was no reason not to wait for the response from the applicants' lawyer, and the court made no effort to contact the applicants' lawyer other than by email in order to take note of his response on this point before making a decision.

10. Furthermore, there was no actual access for the press because the mere presence of "non-accredited journalists" within the meaning of the Press Directive was severely hampered in their work, as they, like the public, were prohibited from taking photographs, sound, and video recordings in the courtroom. All this without this being deemed in the interests of morality, public order, or national security in a democratic society. Nor was this restriction required in the context of the interests of minors or the protection of the privacy of the parties to the proceedings – whom the applicants are calling to account for their actions in the public domain – nor were these restrictions strictly necessary due to special circumstances where public access would harm the interests of due process. The applicants' trial was unfair. Indeed, in considering the application, the court failed to take into account the context of the applicants' application, with which it was aware, and failed to recognize that, under European Union law to which it is bound, applicants have the right to an effective remedy before a tribunal within the meaning of (inter alia) Article 47 of the Charter of Fundamental Rights of the European Union. The applicants refer to the following provisions in this regard.

Article 47 - Right to an effective remedy and to a fair trial

Everyone whose rights and freedoms guaranteed by Union law are violated has the right to an effective remedy before a tribunal in compliance with the conditions laid down in this Article.

Everyone has the right to a fair and public hearing within a reasonable time by an independent and impartial tribunal previously established by law. Everyone shall have the right to be advised, defended, and represented.

[…]

Article 52 – Scope of the rights guaranteed

[…]

2. Insofar as this Charter contains rights corresponding to rights guaranteed by the European Convention for the Protection of Human Rights and Fundamental Freedoms, the meaning and scope of those rights shall be the same as those granted to them by that Convention. This provision shall not prevent Union law from providing more extensive protection.

Treaty on European Union

Article 6

[…]

3. Fundamental rights, as guaranteed by the European Convention for the Protection of Human Rights and Fundamental Freedoms and as they result from the constitutional traditions common to the Member States, shall constitute general principles of Union law.

Treaty on the Functioning of the European Union

Article 267

The Court of Justice of the European Union shall have jurisdiction to give preliminary rulings

a. on the interpretation of the Treaties,

b. on the validity and interpretation of acts of the institutions, bodies, offices or agencies of the Union.[1]

If any question on this point is raised before any court or tribunal of a Member State, that court or tribunal may, if it considers that a decision on the question is necessary to enable it to give judgment, request the Court to give a ruling thereon.

If any question on this point is raised in a case pending before a court or tribunal of a Member State against whose decisions there is no judicial remedy under national law, that court or tribunal shall bring the matter before the Court.

[1] Most relevant parts of this article are highlighted in bold by litigation lawyer

If such a question is raised in a case pending before a national court or tribunal concerning a person in custody, the Court shall give judgment as soon as possible.

11. The applicants have argued, with reasons, that the Covid-19 injections are not so-called vaccines. By vaccines, the applicants mean products that at least qualify as medical products intended to protect or improve human health. In this context, the applicants argue that the Covid-19 injections are in fact a bioweapon and that a misleading, sham validation process has taken place involving, among others, the European Medicines Agency, the State of the Netherlands, and all other respondents in the context of the Covid-19: The Great Reset project. The applicants have explained that the question they wish to submit to the experts nominated in the application, Sasha Latypova and Katherine Watt, is a factual one, namely how the Covid-19 bioweapon in question could be passed through the regulations.

12. In its decision, the court completely ignored the context of the applicants' request and the public interest claimed. Its negative decision contains no consideration on this point that does justice to the interests in the applicants' request, nor to the public interest in this request. Moreover, the decision was not open to appeal without any reasoning. The absence of such reasoning in this context alone makes it clear that a fair trial was not conducted.

13. The rejection of the request makes it impossible for the applicants to obtain a fair and public hearing of their case, within a reasonable time, by an independent and impartial court established in advance by law. Only if the request is granted can the applicants obtain a truly independent expert opinion. Furthermore, the applicants' life expectancy has become highly uncertain as a result of the Covid-19 injections. Two of the three applicants have only a heart function of approximately 30 percent as a result of the Covid-19 injections, whereas it was 100 percent before the injections, and recovery has proven impossible. The court denied the applicants the opportunity to establish their legal position, and according to the order, the same court finds the appointment of the experts nominated by the applicants inadmissible under any circumstances, not even in the main proceedings. The chance that another expert selected and appointed by the court will not benefit the executors of the Covid:19 The Great Reset project is virtually zero. In this way, applicants are denied an effective legal process and a fair trial.

14. Given the significant societal interests at stake, it is inappropriate, as the court did, to delay oral proceedings by more than three months, followed by another six weeks for a ruling. While these may be normal or even short deadlines in typical legal practice, this case, as the applicants argue, involves a criminal project in which Covid-19 injections are used as a bioweapon. It is a well-known fact that in the Netherlands—in the preferred reality—a new "vaccination round against coronavirus" began on September 15, 2025. This could and should have been prevented if the application had been processed and granted in a timely manner.

15. A court that had recognized the importance of promptly answering the questions contained in the petition and the importance of the designated – heavily censored – experts being able to provide testimony on the court's behalf would not have taken months. A properly functioning court acting in the interests of society and its litigants would have played a much more active role in this situation and would not have prevented the designated experts from being appointed by the court and, in that capacity, from presenting their expert opinions to the parties and society in a public trial. By failing to do so, an effective legal process within a reasonable time was not possible.

16. It should be noted that the court, in its order, wrongly designated the experts nominated by the applicants several times as "party experts." The nominated experts were not engaged by the applicants. For this reason alone, they are not party experts. The applicants never designated the experts they nominated as party experts, nor did they leave any misunderstanding regarding their independent position. On the contrary, the applicants stated loud and clear that these experts were independent and explicitly intended, with their request, to have them engaged by the court, and nominated them precisely for that reason. By disqualifying the fully independent experts nominated by the applicants as "party experts," the court left no misunderstanding that it itself was biased. Moreover, it is very serious that the court's disqualification of the nominated experts also lacked any reasoning. This, too, indicates that a fair trial within the meaning of Article 6 of the ECHR was not observed. After all, the qualification of the judge at first instance with regard to the submitted experts as 'party experts' already implies that the judge at first instance is seeking to undermine the legal evidentiary value of an expert report from these experts.

17. The decision thus unfairly disregards the truth. The truth is that these independent experts declared their willingness to provide their expert

opinions before a court, and that, based on this willingness, the applicants nominated these independent experts in their request so that they could be appointed as independent experts by the court. The court then uses the blatant lie that the nominated experts are biased in its rejection of the request, and bases its decision on that. It is scandalous. There was absolutely no fair trial.

18. In view of the foregoing and the arguments raised in the following grounds of appeal against the court's decision, the applicants argue that their case was not given a fair and public hearing because the application was not heard publicly within a reasonable time and was not heard by an independent and impartial judge. Furthermore, the court should have recognized that, by rejecting the application, it left unanswered questions concerning the validity and interpretation of acts of the institutions, bodies, or agencies of the Union. This is inconsistent with European law, which, in the case of questions of this nature, urges or obliges the court to refer preliminary questions to the European Court of Justice. The purport of this European legislation is crystal clear that questions concerning the validity of acts of bodies of the European Union cannot remain unanswered, a principle of legal protection which the court of first instance completely ignored in its rejection decision.

19. Two of the nominated experts, Sasha Latypova and Katherine Watt, after learning of the court's rejection of their request, took the initiative to provide a statement for the main proceedings before the District Court of Northern Netherlands, citing public interest considerations. This is a direct consequence of their awareness of the court's reasoning in the order under appeal under paragraph 3.11, in which the judge, outside of her statutory duty, unnecessarily, unsolicited, and completely incorrectly advocated for the appointment of experts other than those nominated by the applicants, arguing that the other expert appointed by the court would then be "independent." Therefore, the applicants neither commissioned nor paid for this. The applicants are, of course, very grateful for this willingness and gratefully make use of these reports, not only in their own interest but also, and especially, in the public interest. Against this background, an expert opinion by Sasha Latypova is introduced into the proceedings as exhibit 3, and an expert opinion by Katherine Watt as exhibit 4. Latypova's expert opinion is accompanied by more than a gigabyte of underlying official data on which she bases her reasoned and, above all, particularly serious conclusions. Watt, primarily based on the applicable regulations and their historical development, provides evidence of the correctness of her conclusions. These expert

opinions demonstrate without a doubt that the "COVID-19 vaccines" touted by the defendants in the preferred reality as "vaccines against Covid-19," as well as guarantees for the safety of their development and guarantees for the quality of their production, are nothing but bioweapons. After reading these expert opinions and the evidence on which they are based, it should be clear to everyone that this was never about a medicine or vaccine for the benefit of the world's population.

In reality, the Covid-19 injections demonstrably involve "countermeasures" or "countermeasures" developed and produced without significant safety guarantees in case of chemical, nuclear, radiological, and nuclear attacks. Their producers, often located in the USA, are entitled to very broad immunity from civil liability under the applicable regulations there. The EMA, also acting as the executor of the malicious Covid-19 project, treated these "countermeasures" as "vaccines" in the false perception—preferred reality—created by the EMA and all defendants. They failed to further investigate these countermeasures based on so-called "Mutual Recognition Agreements" and allowed them onto the European market under a "Conditional Market Authorization." All of this was done in the full knowledge that this was not a "safe vaccine" but a highly damaging "countermeasure" that is indistinguishable from a bioweapon and is therefore a bioweapon. This course of events also explains why the producers in Europe received essentially the same civil exoneration from the executors of the global Covid-19 project as exists in the USA based on the country's countermeasures regulations. The applicants cannot yet imagine a greater and more serious global violation of human rights. This will change if the respondents, as executors of the Covid-19: The Great Reset project, are not stopped in their implementation, which continues at full speed to this day through deception and intimidation and (among other things) the use of the murderous Covid-19 bioweapon.

20. These statements by Latypova and Watt only increase the (public) stakes in the applicants' request. After all, as the executors of the Covid-19 project, the respondents will have to cling to the official narrative until their last breath. This does not alter the fact that the applicants invite them to resign from their role as executors in this malign global project and voluntarily take responsibility for the immeasurable and often irreparable damage they have caused. Given the extensive and expert opinions and evidence of Latypova and Watt

(nothing less than "nuclear truth bombs"), this procedural suggestion by the applicants can be characterized as exceptionally humane and ethical.

21. In view of the foregoing, the applicants also argue that their application to this court should be deemed admissible, despite the prohibition on legal remedies under Article 200 of the Dutch Code of Civil Procedure, due to a breach of essential procedural rules, as first accepted by the Supreme Court in its Enka v. Dupont judgment. The criterion for an essential procedural breach is the violation of such a fundamental legal principle that their case can no longer be considered fair and impartial. The grounds for appeal and the explanations in this application, as well as the submitted exhibits, demonstrate that this criterion is amply met.

22. In addition to the aforementioned general grievance, the following more specific grievances are lodged against the decision under appeal.

Grief 1

23. In paragraphs 3.1 through 3.6 of the order, the court addresses the content of the request and the assessment framework. The court wrongly failed to consider the assessment framework as set out in the general grievance. The court noted that the applicants used the term "party experts," which, in the context of the request, carried no more meaning than that it referred to the independent experts nominated by the applicants. It should be noted that there is no legal definition of the term "party expert," and the meaning of this term must therefore be determined in context. The explanation given at the hearing was entirely clear on this point, as it was literally stated that the nominated experts were independent and had no financial or other interests that would impede an independent assessment. There was no expert opinion from the experts, and the entire request was aimed at having these independent experts heard by the court. None of the respondents disputed the applicants' explicit assertion of the independence of the nominated experts by referring to financial or other interests (related to the applicants) in their statements. The court, against its better judgment, designated these experts as biased in the sense of not being independent, as if they had already provided expert opinions commissioned by the applicants, which was explicitly not the case and could not be inferred from anything. The applicants'

lawyer noted in this regard (listen to the audio recording for this purpose) that the nominated experts were unwilling to provide written expert opinions for the applicants if they could not do so as court-appointed experts. This was because the nominated experts, heavily censored, could not see the point of doing so. With this deliberate misinterpretation, the court demonstrated its own bias and wrongly rejected the request.

24. Moreover, even if these experts were biased in the aforementioned sense – quod non – there is no legally respectable reason to exclude them. Their expert opinions, which contradict the government's Covid-19 narrative, provide every reason to hear these experts, appointed by the court, to determine the applicants' legal position in a public trial where the respondents have the opportunity to present their own nominated (party) experts during the inquiry or to engage them to question the experts nominated by the applicants. The applicants' counsel addressed this extensively at first instance, pointing out that only a handful of qualified experts worldwide are willing to report their substantiated scientific opinion to a judicial body, contrary to the monstrosity of the "scientific consensus" emphasized by the respondents, and that precisely these experts were nominated by the applicants. An alternative is therefore not available, and the court therefore also lacks alternative experts who necessarily meet this profile to enable a meaningful preliminary expert report for determining the applicants' legal position. This requires qualified experts who do not have the approval of the respondents as executors of the Covid-19: The Great Reset project. The court's entire argument is therefore aimed at nothing other than suppressing the Truth by denying the respondents the preliminary expert report they requested.

Grief 2

25. In paragraphs 3.7 and 3.8, the court refers to the ongoing substantive proceedings and states that these are closely intertwined with the petition. In this regard, the court completely wrongly notes that the petitioners wish to become parties to the substantive proceedings, while the explanation provided by the petitioners' lawyer at the hearing contained no misunderstanding on this point. In paragraph 3.8, the court completely wrongly considers that granting the petition could unacceptably disrupt the ongoing substantive proceedings – in which the petitioners are not and will not be a party – because it is up to the panel in those proceedings whether or not to hear "party experts" in those proceedings. However, the fact is that these are separate proceedings between different parties and that this will remain the

case. The control of the panel in the substantive proceedings will therefore not be affected in any way if the petition is granted, let alone in an unacceptable manner. It is solely up to the judges in the multi-judge chambers and the lawyers of the parties in the main proceedings to determine the direction of that hearing, and not up to the court when considering the request. The reasoning in the decision under appeal is therefore nothing more than fallacious reasoning aimed at halting the search for the truth and preventing the applicants from determining their legal position by granting the request, in which not only they but society as a whole has a legally respectable interest.

Grief 3

26. In paragraphs 3.9, 3.10, and 3.11, the court assumes that, if the request is granted, an inquiry will only involve multiple party experts who, in terms of the parties' distinct positions and viewpoints, will be diametrically opposed. At the end of paragraph 3.11, it adds: "... but that is not what the option provided by the Act to request an examination of a party expert is intended for..." This addition is incomprehensible and, moreover, incorrect. The court confirms, on the one hand, that the request—even if it concerned "party experts" nominated by the applicants, which it does not—concerns a possibility provided by the Act, and then rejects its grant, invoking the empty argument that this statutory option is not intended for that purpose. The judicial reasoning in this regard, in the final sentence of paragraph 3.11 of the decision under appeal, reads as follows: "The debate takes place before the judge in substantive proceedings, and that judge determines how and in what manner the debate should take place." In doing so, the judge completely ignores the fact that the preliminary expert report is precisely intended to enable applicants to determine their legal position so that they can decide whether or not to initiate substantive proceedings. The opportunity for debate between experts from diametrically opposed camps is crucial for this. This reasoning by the judge violates the Act, which assumes that a request such as the present one must be granted, and this senior judge must have understood this very well. This is fallacious reasoning motivated by the judge's bias, aimed at suppressing debate between experts from different camps, which is crucial for establishing the truth and thus a legally significant determination of the applicants' legal position. Applicants are thus prevented from determining their legal position with the necessary legal guarantees of a fair hearing, through a deliberate judicial fallacy.

Grief 4

27. In paragraph 3.12 of the decision under appeal, the court considers that because the applicants are allegedly familiar with the positions of the experts they have nominated and the party experts the respondents intend to call upon, they do not need a hearing to decide whether to initiate substantive proceedings. This argument is unfounded and fallacious. After all, the issue is not the positions themselves, but the quality of the substantiation of the opposing experts' conclusions. The applicants' lawyer explained this in no uncertain terms at the hearing, so the judge must have understood it clearly. As the applicants' lawyer explained at the hearing, the debate between the experts, with the opportunity for both sides to be heard, and the response to the underlying principles and sources of information of the experts is crucial. A one-sided report of the findings of the applicants' nominated experts is insufficient to determine the applicants' legal position in order to decide whether or not to initiate substantive proceedings. This was thoroughly explained by the applicants' lawyer during the oral hearing of the application, so the judge must also have been clear that a one-sided written report from the applicants' nominated experts lacks sufficient legal weight. This argument by the judge is clearly fallacious, because if it were followed, no one would have any interest in a provisional expert report if the expert to be appointed by the court is willing to answer the applicants' questions in writing or by video.

Grief 5

28. In paragraphs 3.13 and 3.14 of the appealed decision, the court considers that, insofar as the experts are also heard as witnesses, it would be insufficiently clear and concrete what the expert witnesses could state about this from their own observations. In doing so, the court completely ignores the applicants' argument that there is a preferential reality. It is precisely on the basis of the experts' own observations, compared with the knowledge and expertise of the nominated experts themselves, that the nominated experts can interpret these observations as the applicants' project Covid-19: The Great Reset, genocide, and the use of a bioweapon. The questions to be asked arose in a time in which the experts live and are precisely those questions that most closely align with their knowledge and experience. It is unclear what could be non-specific about this.

29. Science, at its core, is nothing more than a method for analyzing and explaining what one observes. The questions posed to the experts are therefore, by definition, directly related to the experts' own observations, meaning that their expert opinion cannot be separated from these experts' own observations. This is especially true now that their expert opinion is being sought on events they themselves have experienced, namely the global Covid-19 project and the worldwide deployment of the crucial Covid-19 injections.

Grief 6

30. In paragraph 3.15 of the decision under appeal, the court further considers that it is unclear why the questions to be asked to expert Watt about US regulations and authorities regarding viruses, vaccines, and biological and bacteriological weapons would be relevant. However, the applicants' lawyer made it perfectly clear at the hearing that these questions are relevant to understanding how a bioweapon could be passed through regulations and imposed on the applicants under the guise of a "vaccine." The answer to this question and the expert debate on it will shed light on the truth regarding the feigned COVID-19 crisis and the official government COVID-19 narrative, which the respondents have defended against their better judgment to this day. This insight, to be provided by the experts nominated through their expert opinion, is crucial for determining the legal position of applicants who must demonstrate in a legally plausible manner that the respondents as a group intentionally committed an unlawful act by misleading the defendants as executors of the Covid-19: The Great Reset project with the aim of having them injected with Covid-19 – which is in reality a bioweapon.

Interim measure

31. Your court now has very concrete evidence that the Covid-19 injections should be classified as a bioweapon. Therefore, your court bears a significant social responsibility, and in the applicants' view, also a social obligation, to consider this appeal favorably and, through the interim injunction to be formulated below, to implement an interim measure for the duration of these proceedings to protect the interests of the applicants and society as a whole.

Urgent interest in interim relief

32. The urgent interest in the interim relief requested by the applicants lies in the ongoing unlawful act of the respondents who, as executors

of the Covid-19: The Great Reset project, continue to enable the deployment of the Covid-19 bioweapon through deception. The respondents continue to place all of society, including the applicants, in a preferential reality. This is contrary to the law and to the social care expected of the respondents and is therefore unlawful. The applicants cannot be expected to tolerate this ongoing unlawful act any longer, which can only continue by suppressing the emergence of the Truth. This is especially true because the deployment of the Covid-19 bioweapon is causing significant damage, which directly or indirectly causes material or immaterial harm to citizens and businesses. This interest is therefore also a major public interest.

33. In view of the foregoing, there is also an urgent interest in the interim measure to be formulated below, analogous to Article 223 of the Code of Civil Procedure.

34. To further substantiate the urgent interest, reference is made to a video from April 2024 made by Dr. Masayasy Inoue, Professor Emeritus of the Osaka City University Medical School, specialized in molecular pathology and medicine, who explains that the pandemic and the genetic injections are based on deception that makes informed consent impossible. Even more serious is his warning that a new type of injection is currently being developed and produced in factories in Japan that he has visited. These new injections are based on self-replicating mRNA and are unprecedentedly dangerous to human health. All this is part of the 'Disease X' project, which, under the auspices of the WHO, as a continuation of the project Covid-19: The Great Reset, will be imposed on the world population with further deception and intimidation under the guise of a new 'pandemic'. This proves once again that Covid-19: The Great Reset is running at full speed and must be stopped. This can only happen if the true nature of the Covid-19 injections and "vaccines" is discussed in an open scientific debate initiated by the experts nominated by the applicants in court in a public trial. The video in question is submitted as exhibit 5.

35. The applicants request your court, by way of interim relief, to allow the nominated experts to present their expert opinions to the judges in this case, either in person or via video call, based on reports and factual material submitted by the nominated experts, by way of interim relief for the duration of these proceedings. This provision should be without any restriction on the publicity of this trial, with the possibility for all (international) journalists to take photos and record videos to

truthfully report on it, and with the opportunity for the respondents to also examine other experts before your court.

REQUEST

1. To grant, by way of interim relief, the immediate permission for the experts nominated by the applicants to present their expert opinions on this case before your court, either in person or via video link, using reports and factual material to be submitted by the experts in these proceedings. This is without any restriction regarding the publicity of these proceedings and with the possibility for all (international) journalists to take photos and videos of the hearing in order to truthfully report on it, and with the opportunity for the respondents to also hear other experts before your court;

2. To set aside the order under appeal;

3. To grant the applicants' request as submitted in the first instance;

4. To order the respondents to pay the costs of both instances,
all of this, to the extent permitted by law, provisionally enforceable.

[redacted]

P.W.H. Stassen
Litigation lawyer

Date: 15 September 2025

PRODUCTION OVERVIEW

Appeal

Production 1 Summons dated July 14, 2023, with attachments (attachments on USB)
Production 2 Statement of Increased Claim (in summons proceedings)
Production 3 Expert Opinion by Sasha Latypova (attachments on USB)
Production 4 Expert Opinion by Katherine Watt
Production 5 Video by Professor Dr. Masayasy Inoue (USB)