

SUPREME COURT OF QUEENSLAND

REGISTRY: Brisbane  
NUMBER: 765/23

First Applicant: ASSOCIATE PROFESSOR PETER  
PARRY

AND

Second Applicant: DR SALLY JOHNSTONE

AND

First Respondent: DR JOHN WAKEFIELD,  
DIRECTOR-GENERAL

AND

Second Respondent: STATE OF QUEENSLAND

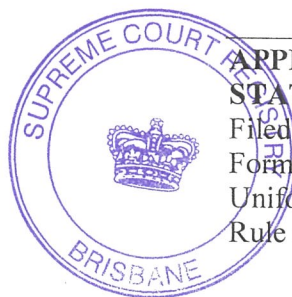
APPLICATION FOR A STATUTORY ORDER OF REVIEW

1. Application to review the decision of the First Respondent, in the course of employment by the Second Respondent, to make the Health Employment Directive No. 12/21 "Employee COVID-19 vaccination requirements" which became effective on 11 September 2021 ("**the Directive**") pursuant to section 51A of the *Hospital and Health Boards Act 2011* (Qld) on 30 September 2021 ("**the Decision**"), pursuant to:

- a. s. 20 of the *Judicial Review Act 1991* (Qld);
- b. further or alternatively, s. 43 of the *Judicial Review Act 1991* (Qld);
- c. further or alternatively, the inherent jurisdiction of the Court;

the Directive relevantly purporting to require all prospective and existing health service employees of Queensland Health who are or are able to be employed to work (as defined by the Directive) ("**the Directive Requirements**");

- a. in residential aged care facilities and residential aged care within a multipurpose health service;
- b. in a hospital or other facility where clinical care or support is provided; and/or



APPLICATION FOR A  
STATUTORY ORDER OF REVIEW  
Filed on Behalf of the Plaintiff  
Form 54, Version 1  
Uniform Civil Procedure Rules 1999  
Rule 566

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- c. in roles that require attendance at a hospital or other facility where clinical care or support is provided;

for existing employees to (**“the Vaccine Requirements”**):

- a. have received at least the first dose of a COVID-19 vaccine (as defined by the Directive) by 30 September 2021;
- b. have received the second dose of a COVID-19 vaccine by 31 October 2021;
- c. provide to their line manager or upload into the designated system:
  - i. evidence of vaccination confirming that the employee has received at least the first dose of a COVID-19 vaccine by no later than 7 days after receiving the vaccine;
  - ii. evidence of vaccination confirming that the employee has received the second dose of a COVID-19 vaccine by no later than 7 days after receiving the vaccine;
- d. receive the prescribed subsequent dose/s of a COVID-19 vaccination (i.e. booster), as may be approved by the Australian Technical Advisory Group on Immunisation (ATAGI), within any recommended timeframe following the second dose; and
- e. provide evidence of vaccination, confirming the employee has received prescribed subsequent dose/s of the vaccine, is to be provided to their line manager or other designated person within 7 days of receiving the vaccine (**“the Evidence Requirements”**);

for prospective and new employees, employment be subject to:

- a. the Vaccine Requirements and the Evidence Requirements;
  - b. evidence of satisfying the Vaccination Requirements being provided as part of the recruitment process.
2. Application to review the refusal or failure of the First Respondent, in the course of employment by the Second Respondent, to make a decision to revoke the Directive subsequent to the date of the Decision (**“the Failure to Revoke the Directive”**), pursuant to:
- a. s. 20 of the *Judicial Review Act 1991* (Qld);
  - b. further or alternatively, s. 43 of the *Judicial Review Act 1991* (Qld);
  - c. further or alternatively, the inherent jurisdiction of the Court.

**The Applicants are aggrieved by the Decision and the Failure to Revoke the Directive because:**

1. The Applicants, by reason of each and all of their professions and employment as medical practitioners, registration under the National Registration and Accreditation Scheme administered by the Australian Health Practitioner Regulation Agency, and work as a health professionals providing healthcare, were and remain each directly affected by the terms of the Directive made pursuant to the Decision.
2. The Applicants have each suffered detriment and are persons whose interests are adversely affected as a consequence of the Decision and the Failure to Revoke the Directive because:
  - a. in circumstances of non-compliance with the Vaccine Requirements and/or the Evidence Requirements, they each are limited, prevented or unable to continue or recommence to be employed by Queensland Health in their practice as medical practitioners in circumstances stipulated in the Directive Requirements;
  - b. their ability to practice as medical practitioners generally, and as employees of Queensland Health specifically, thereby has been and remains limited and adversely affected as a consequence of the Directive and the Directive Requirements made under the Decision.
3. By reason of (1) and (2):
  - a. the Applicants' interests are adversely affected by the Decision and the Failure to Revoke the Directive, as defined by s.44 of the *Judicial Review Act 1991* (Qld);
  - b. the Applicants are persons aggrieved by the Decision and the Failure to Revoke the Directive as defined by s.7 of the *Judicial Review Act 1991* (Qld).

**The grounds of the Application are:**

1. that procedures that were required by *Hospital and Health Boards Act 2011* (Qld) and impliedly by law as stipulated at s. 20(2)(b) of the *Judicial Review Act 1991* (Qld) and in common law to be observed in relation to the making of the Decision and the continuing Failure to Revoke the Directive were not observed as:
  - a. the First Respondent was and is obliged expressly under the *Hospital and Health Boards Act 2011* (Qld) ("**the Act**") in the making of the Decision and the continuing Failure to Revoke the Directive to do so ("**the Statutory Requirements**");
    - i. with the purpose of seeking to establish a public sector health system that delivers high quality hospital and other health services to persons in Queensland having regard to the principles and objectives of the national health system in fulfilling the object of the Act pursuant to s. 5 of the Act;

- ii. with the purpose of giving effect, *inter alia*, to the following principles and objectives of the national health system pursuant to s. 4 of the Act:
  1. that the health system be shaped around the health needs of individual patients, their families and communities;
  2. that the health system should provide all Australians with timely access to quality health services based on their needs, not ability to pay, regardless of where they live in the country;
  3. that Australians receive appropriate high quality and affordable primary and community health services;
  4. that Australians receive appropriate high quality and affordable hospital and hospital-related care;
  5. that older Australians receive appropriate high quality and affordable health and aged care services;
  6. that Australians have positive health and aged care experiences which take account of individual circumstances and care needs;
  7. that Australians have a sustainable health system;
- iii. having regard to and thereby acting to fulfil, *inter alia*, the following principles pursuant to s. 13 of the Act:
  1. acting in the best interests of users of public sector health services as the main consideration;
  2. committing to ensuring quality and safety in the delivery of public sector health services;
  3. acting in response to the needs of users of public sector health services about the delivery of public sector health services;
- b. in exercising the discretion in making the Decision and in the ongoing Failure to Revoke the Directive, the First Respondent was and is obliged by implication under the Act and at common law by reason of the Act's and the relevant provisions' purpose, nature, effect and context (**"the Implied Requirements"**):
  - i. to have obtained direct knowledge of and independently and personally to have reasonably ascertained and considered those facts and matters material to the Decision and the ongoing Failure to Revoke the Directive being (**"the Material Facts"**):

1. in respect of the prevalent Covid-19 virus strain(s) at the time of and since the Decision the actual degrees of:
  - a. spread of the virus;
  - b. transmission of the virus;
  - c. virulence of the virus;
  - d. as a consequence of infection, the actual rates of:
    - i. any symptoms;
    - ii. serious illness;
    - iii. hospitalisation; and
    - iv. death;
2. the actual means by which the prevalent Covid-19 virus strain(s) at the time of and since the Decision were spread and transmitted;
3. the actual propensity of the Covid-19 virus strain(s) prevalent at the time of and since the Decision to cause:
  - a. any symptoms;
  - b. serious illness;
  - c. hospitalisation; and
  - d. death;
4. the actual efficacy or otherwise of the Covid-19 vaccine as defined in the Directive (“**the Vaccines**”) at the time of and since the Decision in materially preventing:
  - a. the spread and transmission of the prevalent Covid-19 virus strain;
  - b. infection with the prevalent Covid-19 virus strain;
  - c. hospitalisation;
  - d. serious illness and death;
5. the actual safety or otherwise (short term and long term) of the Vaccines at the time of and since the Decision for use without exception by any and all employees of Queensland

Health affected by the Directive save only for instances wherein:

- a. the person has a “recognised medical contraindication” (as defined by the Directive);
  - b. a “genuinely held religious belief”;
  - c. “another exceptional circumstance exists”;
6. the actual propensity at the time of and since the Decision of the entire class of persons affected by the Decision, namely current and prospective employees of Queensland Health as defined by the Directive:
- a. to contract, transmit and spread Covid-19; and
  - b. to have the likelihood of contracting, transmitting and spreading Covid-19 materially reduced by receiving the Vaccines;
7. the actual risk of harm at the time of and since the Decision of mandating the Vaccines as required for those affected under the Decision wherein they were at the time of the Decision and remain:
- a. only provisionally approved for use by the Therapeutic Goods Administration;
  - b. experimental in nature;
  - c. provisionally approved for use by the Therapeutic Goods Administration:
    - i. solely upon the basis of safety and efficacy conclusions provided by the manufacturers of the Vaccines; and
    - ii. without the benefit of the raw data as a basis for those claims of efficacy and safety having been provided by the manufacturers of the Vaccines to:
      1. the Therapeutic Goods Administration; or
      2. to the First Respondent;
  - d. reported to have been the sole and direct cause of death and injury in those receiving the Vaccines;

8. the actual risk of harm to, as a result of the Decision and the Failure to Revoke the Directive:
  - a. the affected individuals;
  - b. the Queensland health system;
  - c. the Queensland economy;
9. in respect of death and injury caused to those receiving the Vaccines:
  - a. the number of deaths and injury reported have been caused in those receiving the Vaccines:
    - i. in Queensland; and
    - ii. worldwide;
  - b. the possibility and probability that the number of deaths and injuries reported have been caused in those receiving the Vaccines are understated and by what degree;
10. all and any alternative actions to the Decision and Failure to Revoke the Directive requiring the Vaccines to be received:
  - a. by which the transmission of Covid-19 would be equally or more effectively mitigated;
  - b. which were less likely to result in harm to:
    - i. the affected individuals;
    - ii. the Queensland health system;
    - iii. the Queensland economy;
  - c. which were better subjected to testing and use;
  - d. which were more comprehensively known and understood in their short and long term:
    - i. efficacy;
    - ii. effects; and
    - iii. safety;
  - e. which were more easily implemented;

- f. which were not experimental and/or subject only to provisional approval by the Therapeutic Goods Administration;
  - g. which were more effectively tailored to the unique and individual circumstances of the individual persons to whom they were applied in consideration of:
    - i. the specific circumstances of their work duties and environment;
    - ii. the person's physical circumstances, health, age and pre-existing immunity;
    - iii. the person's pregnancy or otherwise;
11. at the time of and since the Decision, the known mitigating effects in respect of Covid-19 transmission and effect of:
- a. natural immunity and the prevalence of natural immunity amongst:
    - i. health care workers; and
    - ii. the people of Queensland;
  - b. the prevalence of Covid-19 vaccination amongst the people of Queensland;
12. the liability and risks at the time of and since the Decision by mandating of the Vaccines for those persons under the Decision:
- a. the failure of which would result in the affected persons' deprivation or limitation of:
    - i. the profession in which they were exclusively educated and trained;
    - ii. gainful employment;
    - iii. income;
  - b. thereby manifesting in respect of a decision to take the Vaccines in those affected by the Decision:
    - i. involuntariness;
    - ii. undue pressure, coercion and/or manipulation;



- iii. an abrogation of valid and informed consent;
- 13. the possibility and probability at the time of and since the Decision that published mortality rates from Covid-19 infection:
  - a. incorporated deaths causally unconnected with Covid-19 infection;
  - b. were thereby materially overstated;
- 14. modelling of the effects and spread of Covid-19 only upon:
  - a. possessing a direct and personal understanding and knowledge of the underlying bases, data and methodology of such modelling;
  - b. independently being satisfied that such modelling:
    - i. is based in fact; and
    - ii. is predicated upon appropriate and scientific methodology;
  - c. independently having formed a reasonable conclusion based upon those matters at (a) and (b);
- 15. other party reports or summaries containing conclusions as to the effects and spread of Covid-19 and efficacy and safety of the Vaccines only upon:
  - a. possessing a direct and personal understanding and knowledge of the underlying bases, data and methodology of such reports or summaries;
  - b. independently being satisfied that such reports or summaries:
    - i. are based in fact; and
    - ii. are predicated upon appropriate and scientific methodology;
  - c. independently having formed a reasonable conclusion based upon those matters at (a) and (b);
- 16. the economic and operational impact of the Decision and the Failure to Revoke the Directive upon:
  - a. Queensland hospitals and other health facilities; and

- b. the Queensland Economy;
  - 17. long term safety and efficacy of the Vaccines; and
  - 18. the possible or likely consequences and risk of harm to the affected persons by a failure or refusal to have properly determined one or more of these material matters:
    - a. prior to making the Decision; and
    - b. concurrently with the ongoing Failure to Revoke the Directive;
- ii. to have rationally, logically, independently and personally ascertained and have been reasonably satisfied at the time of and since the Decision as to the veracity of the Material Facts based upon the scientifically compiled data and materials being (**“the Proper Ascertainment of Material Facts”**):
  - 1. reasonably available to the First Respondent at the relevant time;
  - 2. objective and independent;
  - 3. not subject to reasonably apparent conflict of interest or potential bias; and
  - 4. predicated upon rigorous and logical scientific methodology;
- iii. to have made the Decision and Refusal to Revoke the Directive only in circumstances wherein the First Respondent:
  - 1. undertook the Proper Ascertainment of Material Facts;
  - 2. ascertained the Material Facts based upon the Proper Ascertainment of Material Facts;
  - 3. relied wholly upon the Material Facts as properly manifesting the factual obligations under the Statutory Requirements;
- c. the procedures required by law to be observed by the First Respondent were not observed in relation to the making of the Decision and the Failure to Revoke the Directive because the First Respondent did not prior to the Decision or at any time:
  - i. undertake the Proper Ascertainment of Material Facts;
  - ii. ascertain the Material Facts;

- iii. rely wholly upon the Material Facts as properly manifesting the factual obligations under the Statutory Requirements;
- 2. that the First Respondent did not have jurisdiction to make the Decision and the Failure to Revoke the Directive under the Act or otherwise at law as stipulated at s. 20(2)(c) of the *Judicial Review Act 1991* (Qld) and in common law because:
  - a. the First Respondent's jurisdiction to make the Decision and the Failure to Revoke the Directive arise solely in circumstances wherein the First Respondent had met:
    - i. the Statutory Requirements; and
    - ii. the Implied Requirements;
  - b. the First Respondent failed to fulfil the Implied Requirements in making the Decision and the Failure to Revoke the Directive because he did not:
    - i. undertake the Proper Ascertainment of Material Facts; or
    - ii. obtain direct knowledge of or independently, personally or reasonably ascertain and consider the Material Facts;
  - c. the First Respondent failed to fulfil the Statutory Requirements and the Implied Requirements in making the Decision and the Failure to Revoke the Directive;
  - d. by reason of the factual matters contained in (a) and (c) herein, the First Respondent did not have jurisdiction to make the Decision and the Failure to Revoke the Directive;
- 3. that the Decision and the Failure to Revoke the Directive were and are not authorised by the Act under which they are purported to have been made as stipulated at s. 20(2)(d) of the *Judicial Review Act 1991* (Qld) and in common law because:
  - a. the First Respondent's authority to make the Decision and the Failure to Revoke the Directive arise solely in circumstances wherein the First Respondent had met:
    - i. the Statutory Requirements; and
    - ii. the Implied Requirements;
  - b. the First Respondent failed to fulfil the Implied Requirements in making the Decision and the Failure to Revoke the Directive because he did not:
    - i. undertake the Proper Ascertainment of Material Facts; or
    - ii. obtain direct knowledge of or independently, personally or reasonably ascertain and consider the Material Facts;

- c. the First Respondent failed to fulfil the Statutory Requirements and the Implied Requirements in making the Decision and the Failure to Revoke the Directive;
  - d. by reason of the factual matters contained in (a) and (c) herein, the First Respondent did not and does not have authority to make the Decision and the Failure to Revoke the Directive under the Act;
4. that the making of the Decision and the Failure to Revoke the Directive was an improper exercise of the power conferred by the Act under which it was purported to have been made and otherwise at law as stipulated at s. 20(2)(e) of the *Judicial Review Act 1991* (Qld) and in common law as:
- a. in making the Decision the First Respondent failed to take relevant considerations into account in the exercise of the power pursuant to the Act and otherwise at law as stipulated at s. 23(b) of the *Judicial Review Act 1991* (Qld) and in common law, specifically that the First Respondent failed to consider:
    - i. those evidences which would and should have been obtained by the First Respondent undertaking the Proper Ascertainment of Material Facts; and
    - ii. the Material Facts which would and should have been reasonably ascertainable by undertaking the Proper Ascertainment of Material Facts;
  - b. the Decision and the Failure to Revoke the Directive is an exercise of power and failure or refusal to exercise a power pursuant to a duty to do so by the First Respondent for a purpose other than a purpose for which the power is conferred as stipulated at s. 23(c) of the *Judicial Review Act 1991* (Qld) and in common law, specifically for the predominant purpose of increasing to the greatest extent possible:
    - i. the number of the Queensland population that has taken the Vaccines; and
    - ii. the proportion of the Queensland population that has taken the Vaccines;
  - c. the Decision and the Failure to Revoke the Directive is an exercise of a discretionary power by the First Respondent in accordance with a rule or policy without regard to the merits of the Decision and the circumstances of the Decision as stipulated at s. 23(f) of the *Judicial Review Act 1991* (Qld) and in common law, specifically that the First Respondent failed to consider specifically:
    - i. those evidences which would and should have been obtained by the First Respondent undertaking the Proper Ascertainment of Material Facts; and

- ii. the Material Facts which would and should have been reasonably ascertainable by undertaking the Proper Ascertainment of Material Facts;
- d. the Decision and the Failure to Revoke the Directive is an exercise of a power that is so unreasonable that no reasonable person could so exercise the power, as stipulated at s. 23(g) of the *Judicial Review Act 1991* (Qld) and in common law, because:
  - i. the objectively reasonably determined facts to which the First Respondent actually had regard and considered in the making of the Decision and the Failure to Revoke the Directive could not and did not reasonably:
    - 1. manifest the formation of those facts constituting the Statutory Requirements or Implied Requirements; or
    - 2. support the making of the Decision and the Failure to Revoke the Directive;
  - ii. to the extent that the First Respondent determined facts to which the First Respondent actually had regard and considered in the making of the Decision and the Failure to Revoke the Directive which in the mind of the First Respondent or at all:
    - 1. manifested the formation of those facts constituting the Statutory Requirements or Implied Requirements; or
    - 2. supported the making of the Decision and the Failure to Revoke the Directive;

the determination of those facts was wholly unreasonable and illogical;
  - iii. in the making of the Decision and the Failure to Revoke the Directive unreasonably failed or refused to:
    - 1. undertake the Proper Ascertainment of Material Facts;
    - 2. obtain and consider those evidences which would and should have been obtained by the First Respondent in undertaking the Proper Ascertainment of Material Facts;
    - 3. ascertain the Material Facts which would and should have been reasonably ascertainable by undertaking the Proper Ascertainment of Material Facts;
    - 4. consider the Material Facts which *in toto*:

- a. indicate that the Decision and the Failure to Revoke the Directive could not have reasonably been made;
  - b. if ascertained and reasonably considered by the First Respondent ought reasonably have led the First Respondent to refuse to make the Decision or the Refusal to Make the Directive;
- 5. that there was no probative evidence or other material to justify the making of the Decision or the Failure to Revoke the Directive as stipulated at s. 20(2)(h) of the *Judicial Review Act 1991* (Qld) and in the common law, because:
  - a. the First Respondent could only have made the Decision and continue to decide the Failure to Revoke the Directive upon establishing those matters being, as required by law by reason of the Statutory Requirements and the Implied Requirements:
    - i. the Material Facts; and
    - ii. those facts constituting the Statutory Requirements;
  - b. there was and is no probative evidence or other material from which the First Respondent could or can reasonably be satisfied that those matters were or are established in making the Decision and the Failure to Revoke the Directive, or could or did reasonably:
    - i. manifest the formation of those facts constituting the Statutory Requirements; or
    - ii. support the making of the Decision and the Failure to Revoke the Directive;
  - c. there was and is no probative evidence or other material viewed or considered by the First Respondent to support those matters that the First Respondent ought to have considered in making the Decision, but did not, being:
    - i. the evidence which could and should have been obtained by the Proper Ascertainment of Material Facts; and
    - ii. the Material Facts;
  - d. the evidence and other material which could and should have been obtained by the Proper Ascertainment of Material Facts and the Material Facts *in toto*:
    - i. indicate that the Decision and the Failure to Revoke the Directive could not have reasonably been made;
    - ii. if ascertained and reasonably considered by the First Respondent ought reasonably have led the First Respondent to refuse to make the Decision or the Refusal to Make the Directive;

- e. the First Respondent based and continues to base the Decision and the Refusal to Make the Directive upon the fact that the Vaccines are materially effective to prevent the spread of Covid-19, wherein such fact:
  - i. is unsupported by any probative evidence and material considered by the First Respondent or otherwise;
  - ii. is directly controverted by the reasonably available probative evidence and material; and
  - iii. does not exist;
6. At the time of and since the Decision, the Decision and the Failure to Revoke the Directive are, with regard to and in the circumstances of the reasonably available Material Facts:
  - a. unreasonable, illogical and irrational;
  - b. not reasonably proportionate;
  - c. excessive; and
  - d. ignore and fail to apply alternatives materially less damaging to:
    - i. those affected by the Directive, including the Applicants;
    - ii. the Queensland Health system;
    - iii. the Queensland economy; and
    - iv. the people of Queensland.

**The Applicants claim:**

1. an order pursuant to s. 30(1)(a) of the *Judicial Review Act 1991* (Qld) or alternatively a prerogative order pursuant to s. 43(1)(a) and s. 47(2) of the *Judicial Review Act 1991* (Qld) in the nature of *certiorari*, or alternatively the inherent jurisdiction of the Court that the Decision be quashed or alternatively set aside with effect from the day of the making of the order;
2. an order pursuant to s. 30(3)(a) of the *Judicial Review Act 1991* (Qld) or alternatively a prerogative order pursuant to s. 43(1)(a) and s. 47(2) of the *Judicial Review Act 1991* (Qld) in the nature of *mandamus*, or alternatively the inherent jurisdiction of the Court that the Directive made under the Decision be revoked from the day of the making of the order;
3. a permanent injunction, or prerogative order in the nature of prohibition or prerogative injunction pursuant to s. 43(1) and s. 47(1) of the *Judicial Review Act 1991* (Qld), or alternatively the inherent jurisdiction of the Court, prohibiting the Respondents from enforcing the Directive from the time of the order;

4. costs in the proceedings.

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TO THE RESPONDENT:

A directions hearing in this application (and any claim by the applicant for an interlocutory order) will be heard by the Court at the time, date and place specified below. If there is no attendance before the Court by you or by your counsel or solicitor, the application may be dealt with and judgment may be given or an order made in your absence. Before any attendance at that time, you may file and serve a notice of address for service

APPOINTMENT FOR DIRECTIONS HEARING

Time and date: 20/3/2023 10:00am

Place: Brisbane Supreme and District Court, 415 George Street, Brisbane QLD 4001

Signed:

Dated:



PARTICULARS OF THE APPLICANTS:

Name:	Associate Professor Peter Parry
Residential or Business Address:	c/- NR Barbi Solicitor Pty Ltd Suite 15, 900 Brunswick Street NEW FARM QLD 4005
Applicant's solicitor's name: and firm name:	Natalie Strijland NR Barbi Solicitor Pty Ltd
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Name:	Dr Sally Johnstone
Residential or Business Address:	c/- NR Barbi Solicitor Pty Ltd Suite 15, 900 Brunswick Street NEW FARM QLD 4005
Applicant's solicitor's name: and firm name:	Natalie Strijland NR Barbi Solicitor Pty Ltd
Solicitor's Business address:	Suite 15, 900 Brunswick Street NEW FARM QLD 4005



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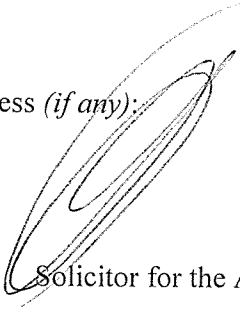
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(07) 3358 5448

E-mail address (if any):

natalie@nrbarbisolicitor.com.au

Signed:

Description:  Solicitor for the Applicants

Dated: 20.01.2023.

This application is to be served on:

Dr John Wakefield, Director-General  
c/- Queensland Health  
33 Charlotte Street  
Brisbane QLD 4000

State of Queensland  
c/- Department of Justice and Attorney-General  
State Law Building  
50 Ann Street  
BRISBANE QLD 4000