

This letter is sent by PELS RIJCKEN in The Hague, The Netherlands

District Court of Northern Netherlands

Session of November 27th, 2024

Case/dock number C/17/190788 / HA ZA 2023-172

State of Defence

from

William Henry Gates III

living in Medina (United States of America)

defendant sub 15,

lawyer: W. Heemskerk in The Hague

for

1.living in Sneek, municipality of Súdwest-Fryslân,
2.living in Sneek, municipality of Súdwest-Fryslân,
3.living in Sneek, municipality of Súdwest-Fryslân,
4. ,..... living in Doetinchem,
5.living in Doetinchem,
6.lived in Zaandam, municipality of Zaanstad,
7.living in Leeuwarden,

claimants,

lawyer: Mr. A.G.W. van Kessel in Leeuwarden.

1 INTRODUCTION

1.1 By summons dated July 14th, 2024 (hereinafter: “**Summons**”), claimants (hereinafter: □□ “**et al.**”) have served a writ of summons to Mr. William Henry Gates III (hereinafter: “**Gates**”) before your court. In addition to Gates, □□ **et al.** have also served a writ of summons to sixteen other parties, fifteen natural persons and one legal entity, the State of the Netherlands.

1.2 In short, □□ **et al.** state that Gates and the other defendants as a group and individually have acted unlawfully towards them. This unlawful action would consist of Gates and the other defendants intentionally misleading the plaintiffs and thereby inducing them to have the Covid-19 injections of which defendants knew, or at least should have known, that these injections were not safe and effective.

1.3 These accusations are incorrect. Gates did not mislead the plaintiffs, nor did he in any way otherwise act unlawfully towards them. For the award of the claims of □□ et al., there is no basis whatsoever. In the text that follows, Gates will refute the statements and accusations of □□ et al.

2 □□ et al. ACCUSATIONS ARE (COMPLETELY) INADEQUATE

2.1 In these proceedings □□ et al. claim a declaratory judgment that the defendants (jointly and severally) have acted unlawfully towards them by “*deliberately and unlawfully misleading them and thereby inducing them to have Covid-19 injections of which defendants knew, or at least should have known that these injections were not safe and effective.*”¹. In continuation □□ et al. claim that the defendants be sentenced jointly and severally to the payment of compensation, to be specified in the statement.².

2.2 Gates states that □□ et al. have made completely insufficient arguments for substantiation of these claims. This requires (at least) that the plaintiffs state (and, if disputed, also prove) the facts, based on which the intended legal effect can be invoked. □□ **et al.** have not met their obligation to substantiate their claim.

2.3 In any case, in order to comply with the obligation to substantiate the claim, imposed on □□ **et al.**, they may be expected to state in a motivated and substantiated manner: (1) that they have been vaccinated, and if so, (2) with which vaccine they were vaccinated, (3) when they have done so, and (4) which (allegedly unlawful) conduct of (which) defendant(s) induced them to do so. These essential elements of the obligation incumbent upon them have not at all been made plausible.

□□ **et al.** have not submitted any vaccination certificates showing that they - let alone when – were vaccinated, they have not stated anything about which vaccine they would have received (and whether these are the mRNA vaccines in question, of which □□ **et al** state that they would be dangerous), and they also leave undiscussed which behavior and statements made by which defendant(s) personally guided them towards having a vaccination, and whether these behaviors and statements occurred before □□ **et al.** had themselves been vaccinated (which is a minimum requirement for the existence of a causal link).

2.4 Moreover, substantiated statements by □□ **et al** regarding the damage allegedly suffered by them are lacking. The plaintiffs substantiate their claim of alleged damage that only contains (almost identical) doctor's statements which certainly cannot be considered neutral, objective, reliable and expert (see marginal 4.3.4). These doctor's certificates are therefore not required and must not be taken into account and cannot serve to substantiate the damage from □□ **et al.**

2.5 In this state of affairs, Gates emphatically disputes that □□ **et al** got vaccinated, and if they did, they did not do so as a result of any actions by him (or by the other defendants), and that as a result the plaintiffs have suffered damage. □□ **et al** have not (by a long shot) met the requirements imposed on them about the obligation to state the claim. For this reason alone, the claims should be rejected.

3 □□ **et al** MAKEFACTUALLY WRONG STATEMENTS

3.1 With regard to what □□ **et al** have stated, these statements lack factual basis. The positions taken by □□ **et al** are based in meaningless conspiracy theories and they hang together from unfounded suggestions and speculations that go against the global consensus on the existence of the coronavirus and the safety of the vaccines. Gates disputes everything □□ **et al** have stated, except where he concludes that the statements are correct.

3.2 The coronavirus and the vaccines

3.2.1 First of all, □□ **et al** do not seem to recognize that the SARS-CoV-2 virus (hereinafter: “**Coronavirus**”) and the respiratory illness caused by it, actually exist. They are under the assumption that the “narrative” based on this is a part of an evil premeditated plan to destroy the world's population injecting it with a vaccine that is, according to □□ **et al**, unsafe (or even poisonous). This is not correct. The Coronavirus exists and can cause various health problems, the seriousness of which should not be downplayed. There is no global conspiracy and the vaccines that protect against the

Coronavirus are safe and they are approved and authorized by the competent authorities.

3.2.2 Several other defendants agree that the statements of **□□ et al** are incorrect and in this procedure this has been convincingly demonstrated. In their conclusions in reply the defendants sub 1 to 11, 14 and 17 have addressed, among other things: (1) the existence of the Coronavirus and the scientific consensus on it, (2) the course of the corona pandemic in the Netherlands, (3) government policy aimed at combating the corona pandemic and decision-making regarding it, and (4) the development, admission and safety of the mRNA corona vaccines.

3.2.3 Gates adopts the positions of the other defendants in this regard and makes them his own. Their statements are to be considered as herein repeated and included. In particular, Gates refers to chapters 1, 2, 5 and 6 from the statement of defense of the defendants sub 1 to 10, 14 and 17 (hereinafter: “**SOD of the State et al.**”, submitted by Gates as **Appendix 1**) and Chapter 3 from the conclusion of response from defendant sub 11 (hereinafter: “**SOD of Bourla**”, by Gates included herein as **Appendix 2**).

3.2.4 In addition, Gates highlights two crucial inaccuracies in the Summons of **□□ et al**, explicitly refuting with regard to the safety of the corona vaccine. It concerns the statements of **□□ et al** that: (1) the mRNA corona vaccine contains graphene oxide³ and (2) cited by **□□ et al** from the Pfizer report of April 30th, 2021 with No. FDA-CBER-2021-5683-0000054 (hereinafter: “**Pfizer Report**”), follow that Pfizer's mRNA corona vaccine would be unsafe⁴. Gates disputes these statements:

(1) The mRNA corona vaccines do not contain graphene oxide

3.2.5 As explained in detail in the SOD of the State et al. and in the SOD of Bourla, the chemical composition of the mRNA corona vaccines is public, and it is evident from the published list of ingredients that graphene oxide is not a component of the mRNA corona vaccine.⁵ The statements made in this regard by **□□ et al** are incorrect and insufficiently substantiated. Gates refers expressly, for the refutation by **□□ et al**, to paragraph 6.3 of the SOD of the State et al. (Appendix 1) and paragraph 3.3.3 of Bourla's SOD (Appendix 2).

(2) **□□ et al.** misinterpret the Pfizer report

3.2.6 In addition, **□□ et al.** fundamentally misinterpret the Pfizer report.⁶ **□□ et al** argue in response to the Pfizer report, that a clinical trial for Pfizer's mRNA vaccine was administered, that 42,086 people participated, that 1,223 people died, and that 11,361

people have suffered permanent injury. According to [redacted] **et al**, the Pfizer report shows that the mRNA corona vaccine is dangerous.

3.2.7 However, the Pfizer report provides no evidence of anything of the sort.

3.2.8 Firstly, the Pfizer report is not a report of a clinical trial, but one analysis of vaccine side effects reported to Pfizer worldwide. As shown in the Pfizer report, a total of 42,086 adverse events were reported. The mentioned numbers of 1,223 reported deaths and 11,361 reports of persons with serious permanent injuries should not be compared to *the total side effects* (as [redacted] **et al** do), but against *the total of vaccines that are administered*. The latter number has actually been omitted from the discussion submitted by [redacted] **et al** Pfizer Report 7. Against this background, the figures from the Pfizer report confirm the safety rather than the unsafety of the vaccines; according to the European Medicines Agency (hereinafter: “**EMA**”) were until April 29th, 2021 more than 330 million doses of the vaccine were administered worldwide.⁸

3.2.9 Secondly, [redacted] **et al**. suggest that the reported side effects are a consequence of the corona vaccine, but that is incorrect. The Pfizer report only shows that the reported side effects occur at some point *after* the vaccination occurred, not that they occurred *due to* the vaccination.⁹ [redacted] **et al** apparently confuse correlation with causation. The reported side effects that are caused by the vaccine are not supported by the Pfizer report and that cannot be deduced from that either.

3.2.10 Thirdly, [redacted] **et al** provide concrete statistical data from the Pfizer report incorrectly. For example, [redacted] **et al** state that the Pfizer report shows that 11,361 persons suffered serious and permanent physical injuries while the Pfizer report in fact states that 11,361 individuals have not fully recovered in the reporting period covered by the Pfizer report.¹⁰ Those are essentially two different things. That 11,361 people (i) would not have recovered at all (also not outside the reporting period), let alone (ii) that they have serious permanent injuries is not apparent from the Pfizer report. This statement of [redacted] **et al** is therefore (also) incorrect.

3.2.11 As also concluded in the SOD of the State et al. (Appendix 1) and the SOD from Bourla (Appendix 2),¹¹ from the Pfizer report submitted by [redacted] **et al** it cannot be inferred that the Pfizer corona vaccine is dangerous. This is also inconsistent with the fact that the Pfizer corona vaccine has been approved by the EMA, such as (again) explained in detail in the SOD of the State et al. and the SOD of Bourla.

3.3 Gates' role during the corona pandemic

3.3.1 Furthermore, [redacted] **et al** make incorrect statements about the role that Gates would have played in the execution of the alleged plot that a 'Great Reset' would likely achieve. In summary, [redacted] **et al**. seem to state that Gates, through legal entities or other

organizations that, according to the plaintiffs, fall under Gates' control, prepared the 'Covid-19 project' and carried this out worldwide by, among others, the Dutch government and the World Health Organization (hereinafter: “**WHO**”). However, none of this is true.

3.3.2 Firstly, □□ **et al.** ignore the fact that Gates cannot be identified with the organizations with which □□ **et al.** associate him. The Bill & Melinda Gates Foundation (hereinafter: “**Gates Foundation**”) is, as a legal entity, a separate legal subject with its own rights and obligations. The same goes for others legal entities with which the plaintiffs associate Gates, such as Microsoft and Heineken, and organizations the Gates Foundation works with like the public-private partnership Gavi, the Vaccine Alliance (hereinafter: “**Gavi**”)12 or the John Hopkins Center for Health Security (hereinafter: “**John Hopkins Center**”). All statements regarding the actions and behavior of these organizations are irrelevant to the claims against Gates.

3.3.3 Secondly, □□ **et al** state that the Gates Foundation, together with Gavi determines the WHO's policy without substantiating their claim.13. This is incorrect. The WHO is part of the United Nations, and its policies are determined by the World Health Assembly: The WHO's highest decision-making body is made up of delegations from all member states.14. The decisions and policies of the World Health Assembly are carried out by the WHO Executive Board, which includes 34 members with technical healthcare qualifications participate.15. The Gates Foundation and Gavi are not part of the Board, nor do they influence the WHO governance structure, part of the World Health Assembly or the WHO Executive Board.

3.3.4 Moreover, □□ **et al** have not demonstrated that (let alone how) the Gates Foundation and Gavi would exerts decisive influence on the WHO or other international organizations. It remains a bare statement that is disputed by Gates.

3.3.5 Thirdly, it is incorrect that Gates has been preparing for years the so-called 'Covid-19 project'. Gates understands the Summons in such a way that the plaintiffs assume that this emerges from a sum of several events that according to the plaintiffs are related. In essence, the events mentioned by □□ **et al** have nothing to do with each other and it does not appear that Gates was preparing the alleged 'Covid-19 project' for years. Gates explains this.

3.3.6 First of all, □□ **et al** mention two media appearances by Gates from which, according to them, it appears that Gates knew that there would be a corona pandemic.16. They refer to Gates' TED talk of April 3, 2015.17. and Gates' interview with Vox of May 27th, 2015,18. in which, according to the plaintiffs, Gates would sow fear about the arrival of the Coronavirus.

3.3.7 Further, the plaintiffs allege that Gates was already aware of the arrival of the Coronavirus. However, this cannot be deduced from these videos, and it is not based on

facts. In the aforementioned videos, based on historical examples, Gates warned about new pandemics, not because he had prior knowledge hereof (which □□ **et al** have neither stated nor demonstrated), but because scientists and public health experts have long known that the world is vulnerable to new infectious diseases. The idea that Gates consciously spread the Coronavirus, planned, or knew that the Coronavirus was coming, is based on a misinterpretation of his call for preventive measures. His messages from the videos mentioned were precisely intended to help prevent or combat a pandemic as best as possible, not to start, predict or cause one.

3.3.8 In addition, □□ **et al** draw incorrect conclusions from the pandemic exercises which were organized by the John Hopkins Center. According to □□ **et al** it appears that the Covid-19 project has been prepared worldwide.¹⁹

3.3.9 This is also based on misinterpretations. The pandemic exercises referred to by □□ **et al** are not organized to prepare for a global pandemic, but to help governments and international organizations to be prepared through a simulation of a hypothetical situation for prevention and control of a possible future pandemic. These pandemic exercises were based on known scientific risks of new infectious diseases, and the insights from the simulations have been shared publicly by the John Hopkins Center. Gates refers to go to the website of the John Hopkins Center, where this information is still available can always be consulted.²⁰ The fact that no information has been kept secret points precisely to the intention to make the world more resilient to pandemics, not to covertly to prepare for one.

3.3.10 Furthermore, □□ **et al** state that the Gates Foundation has commissioned Moderna and Pfizer to develop an mRNA corona vaccine, and that Moderna and Pfizer had been working on this since 2011, well before the corona pandemic.²¹ However, this is not apparent from the exhibits submitted by □□ **et al** with the Summons. The alleged investment of the Gates Foundation to which □□ **et al** refer in Exhibit 73 to the Summons relates to the development of an mRNA vaccine to prevent HIV infections and therefore has nothing to do with alleged preparations for a vaccine against the Coronavirus. In addition, it appears from the patent application submitted by the plaintiffs as exhibit 72 to the Summons that there was no involvement of the Gates Foundation, nor of Gates in person.²² These documents are irrelevant.

3.3.11 Finally, □□ **et al** refer to two media appearances by Gates in which he would have strengthened the “*official Covid-19 narrative*” and in which he allegedly said that the corona vaccines are safe and effective.²³ This, according to □□ **et al**, is even worse because Gates knew at that moment that the corona vaccines were not safe, for which □□ **et al** again refer to the Pfizer report and state that Gates knew that the corona vaccines contained graphene oxide.²⁴

3.3.12 Gates does not see how these videos indicate any involvement and how a global conspiracy could turn out. Other than stating that Gates knew that the corona vaccines were not safe, the plaintiffs don't explain their allegations. With regard to his supposed knowledge, however, Gates has already explained that the plaintiffs' propositions regarding the safety of the corona vaccines (and more specifically about the Pfizer report and the incorrect statements about the presence of graphene oxide in the corona vaccines) are not correct (leaving aside that it is also implausible that Gates was personally aware of the Pfizer report or the chemical composition of the corona vaccine).

3.3.13 Based on other information Gates allegedly was aware of the supposed safety issues and the ineffectiveness of the vaccines. These statements by the plaintiffs are unsubstantiated and they have not been able to demonstrate them. In what way the two videos from April 30th and December 2nd, 2020, respectively, provide evidence for Gates' participation in a global conspiracy and deliberate deception of the public, is a complete mystery to Gates.

3.3.14 Gates further notes that the Gates Foundation is a no-profit foundation under American law that operates with the aim to improve global healthcare and fight poverty. In that context the Gates Foundation finances various projects to combat infectious diseases, including indeed, projects related to the combating the Coronavirus. Contrary to what □□ **et al** seem to suggest, the Gates Foundation does not operate secretly, but it is extremely transparent, among other things making its investments public in an online database, by regularly reporting to the *International Aid Transparency Initiative Standard and the Organization for Economic Co-operation and Development*, publishing its annual, audited reports and tax returns, and publishing most of the research funded by the Gates Foundation.

3.3.15 All in all, Gates concludes that □□ **et al** could not prove in any way that Gates is part of a global conspiracy and that □□ **et al** were induced to take a corona vaccine, while he knew that the vaccine was not safe and not effective. The claims of □□ **et al** are based on thin air and cannot succeed.

4 □□ **et al DO NOT SHOW ANY REQUIREMENTS OF A TORT**

4.1.1 Not only do □□ **et al** make factually incorrect statements, but they also don't show any element of an unlawful act. From the information taken by □□ **et al** (incorrect) statements no intentional and unlawful misleading of □□ **et al** (whether or not in a group) is shown. □□ **et al** have not made it plausible that they have suffered damage as a result of the corona vaccine, let alone that this damage is causally linked to the alleged conduct of Gates (or the other defendants).

4.1.2 Only to the extent that the statements of □□ **et al** are to be understood as meaning they assert a derivative liability of Gates as (co) director of the Gates Foundation, any

statement regarding the liability of the Gates Foundation is missing; further, no liability of the Gates Foundation has been alleged. Hence, the claim would fail. For the rest, Gates puts forward the following defense.

4.2 No unlawful actions by Gates

(1) No violation of Article 97a of the Criminal Code

4.2.1 Gates understands that **□□ et al** accuse him of protecting the alleged interests of Klaus Schwab and the World Economic Forum (hereinafter: “**WEF**”) in carrying out, supporting, and making possible the purported 'Great Reset'. 25. Thus, according to the plaintiffs, Gates purportedly violated Article 97a of the Criminal Code (CC). However, this is ill founded.

4.2.2 Article 97a of the Criminal Code makes it unlawful to request support abroad for a change or annulment of the constitutional order, with the aim to protect the Dutch constitutional form of government against such revolution.²⁶ However, **□□ et al** do not explain why a threat in this regard would be the case, nor what role Gates would have played in it and why violation of 97a of the Criminal Code in this case provides a basis for awarding a compensation to **□□ et al**, in view of the relativity requirement of Article 6:162 (Dutch Civil Code, DCC).

(2) No abuse

4.2.3 In addition, **□□ et al** argue that Gates was guilty of abuse by deliberately harming the health of **□□ et al**. Gates understands **□□ et al**'s accusations as meaning that he allegedly acted contrary to article 300 CC.²⁷ This is also not the case.

4.2.4 Committing assault is a crime and it is required that it be an intentional and unlawful infliction of bodily harm.²⁸ As explained in the SOD of Bourla (Appendix 2),²⁹ the vaccines meet the legal standards for safety, effectiveness and production quality, and are the purpose and effects of the vaccines clearly communicated to the public. Of the intentional infliction of injury there is no question; the vaccines are safe and as far as Gates purportedly influenced **□□ et al** in taking a vaccine, Gates also assumed that it is safe.

4.2.5 In addition, **□□ et al** were not forced to take a vaccine, that is why there can be no question of the unlawful administration of a vaccine. To the extent that **□□ et al** have been vaccinated, they gave permission for this. There can therefore be no question of abuse in a general sense.

4.2.6 Moreover, Gates did not personally administer the vaccinations to **□□ et al**, which means that this action cannot be attributed to him in any case.

4.2.7 Finally, it applies to the claimants, **□□**, **□□**, **□□** and **□□** that, according to the doctor's certificates submitted by them (exhibit 91 to the Summons), they have not

experienced any physical complaints at all from the vaccinations. In absence of any psychological injury, there can be no question of abuse.

(3) No genocide

4.2.8 Furthermore, □□ **et al** state that it is "plausible" that Gates and the other defendants have been guilty of a violation of Article 3, paragraph 1, sub b and c of the International Crimes Act.³⁰ Therefore, they request your court to investigate whether there is genocide. However, this suspicion of □□ **et al** is not supported by any element or explained, and is based on nothing. Your court should ignore this request.

4) No action contrary to an unwritten law of social interaction

4.2.9 Finally, □□ **et al** state that Gates cooperated in the implementation of the “*Great Reset project and the widespread deception required.*”³¹ According to □□ **et al** this behavior by Gates allegedly goes against an unwritten law in society.³²

4.2.10 However, there is no question of unlawful conduct on the part of Gates. As explained, actions of other (international) organizations cannot be attributed to Gates. Moreover, Gates has not been guilty of misleading □□ **et al**. In the media appearances, to which □□ **et al** refer - and for which they apparently blame Gates in person – Gates did not intend to mislead the world population, including □□ **et al**, into taking an unsafe and ineffective corona vaccine. The messages and statements in those video messages are accurate and truthful, with the aim of providing correct information. There is no deception, let alone deliberate deception.

4.3 No damage

4.3.1 Furthermore, □□ **et al** have not made it plausible that they suffered damage. Although reference to the damage assessment procedure as referred to in Article 612 Rv is made, the possibility of damage must be made plausible,³³ and the plaintiffs have not even met that threshold.

(1) The vaccine does not contain any dangerous or toxic substances

4.3.2 To substantiate the plausibility of damage, □□ **et al** state that they are vaccinated with “*the poisonous graphene oxide*”. According to them, it is therefore plausible that they (will) experience lasting adverse effects from the vaccinations.³⁴

4.3.3 As already explained, it is incorrect that the corona vaccines contain graphene oxide. In any case, this cannot reveal the plausibility of damage. As far as the plaintiffs believe that there are other toxic or dangerous substances in the vaccines, this is not allegedly by them.

(2) □□ **et al** do not meet their obligation to provide information in this context either

4.3.4 Furthermore, the plausibility of damage cannot be apparent from the doctor's statements which □□ **et al** have submitted as exhibit 91. As explained in detail in the SOD of the State et al. (Appendix 1), as well as in the SOD of Bourla (Appendix 2), the submitted statements are broadly identical to each other, the doctor's statements contain Mr. A.H. van Walraven's own opinions about the corona vaccinations and government policy and include the doctor's untenable conclusions regarding the causality between the alleged occurrences and the corona vaccinations.

4.3.5 The doctor's statements are therefore certainly not neutral, objective, reliable, or considered to be expert's opinions and should be ignored. Some things are explained in detail in Chapter 7 of the SOD of the State et al. and paragraph 4.2.2 of the SOD of Bourla. Gates takes these statements and makes them his own.

4.3.6 Furthermore, it applies to the claimants, □□, □□, □□ **and** □□ that they totally haven't experienced any physical complaints at all from the vaccinations.³⁵ That these claimants have suffered damage is therefore not at all plausible.

(3) Alleged non-material damage is not eligible for compensation consideration

4.3.7 Finally, □□ **et al** have not made it plausible that they suffered immaterial damage that is eligible for compensation. They state that their non-material damage consists of, on the one hand, the disadvantage that they have experienced mentally (□□ **et al** identify feelings of pain, suffering, shame, powerlessness and uncertainty about their health), and on the other hand, ignorance about the precise consequences of the vaccine.³⁶ With this, □□ **et al** apparently rely on Article 6:106(b) of the Dutch Civil Code, but they wrongly ignore that psychological discomfort alone is insufficient for awarding damages.³⁷ □□ **et al** have provided insufficient concrete and objective data from which it can be concluded that psychological damage had occurred to them. The doctor's statements to which □□ **et al** refer, in any case are not sufficient for this.

4.4 No causal relationship

4.4.1 Gates repeats that □□ **et al** have not made it plausible that they have ever been vaccinated, nor has one of them submitted proof of vaccination. But more importantly: they have not even stated or made it plausible that they have been vaccinated as a result of the Gates videos they mentioned. On the contrary: □□ **et al** explicitly state that, in response to the "*many public statements*" by the, at the time, Minister De Jonge and by the, at the time, Prime Minister Rutte, who "*largely rely on television press conferences*", they "*[have] felt called to be injected with Covid-19 injections*".³⁸ [addition of lawyer].

4.4.2 If these public statements by Minister De Jonge and Prime Minister Rutte at the time have been the reason for □□ **et al** to get vaccinated, then it is very clear that it was not the two videos of Gates from April 30th and December 2nd, 2020, respectively, which

prompted □□ **et al** to take a corona vaccine. They did not state the latter either and this is also explicitly contested by the lawyers of □□ **et al** at the hearing of Gates' jurisdictional incident that took place on September 18th, 2024.

4.4.3 A causal link between Gates' alleged conduct and the taking of a corona vaccine has therefore not been made plausible by □□ **et al**. Further given that the plaintiffs have also stated without substantiation: (1) that the vaccine in general has the potential to cause the alleged harm and (2) that the vaccine actually led to the alleged damage, it is possible that the required causal link between Gates' alleged conduct and the alleged damage is certainly not accepted.

4.5 No group liability

4.5.1 Finally, there is no group liability under Article 6:166 of the Dutch Civil Code. For this, □□ **et al** should have substantiated that: (1) Gates participated in, (2) a behavior in a group context, (3) the chance of which causing harm should have prevented him from participating in that group, that (4) Gates' participation can be attributed to him and that (5) (in any case) one of the participants of the unlawful group conduct caused the damage. □□ **et al** were not successful in meeting this requirement.

4.5.2 The facts stated by □□ **et al** do not show in any way that this is the case of a behavior in a group context. As mentioned, □□ **et al** wrongly explain all kinds of non-existent connections between events and conduct of defendants that have nothing to do with each other. None of the 'facts' stated by □□ **et al** actually show that the defendants cooperated with each other in achieving this and performing a 'Great Reset'. Moreover, Gates has not acted unlawfully (and the same applies to the other defendants). For that reason, Gates (and the other defendants) are also not liable under Article 6: 166 of the Dutch Civil Code.

5 CONCLUSION

Based on the foregoing, Gates concludes that all claims are rejected, and the plaintiffs be condemned to bear the legal costs.

Signed with the signature of the lawyer

Notes:

1 Summons, petition, under 1.

2 Summons, petition, under 2.

3 See Summons, edge no. 150 et seq.

4 See, among others, Summons, edge nos. 42, 45, 55, 85, 99, 108 and 143.

5 See SOD of the State et al., section 6.3 and SOD of Bourla, section 3.3.3.

6 See also SOD of the State et al., paragraph nos. 6.4.1 et seq. and SOD van Bourla, edge nos. 88 et seq.

7 See Exhibit 40 to the Summons, paragraph 3.1.1, p. 6: "It is estimated that approximately [redacted] doses of BNT162b2 were shipped worldwide from the receipt of the first temporary authorization for emergency support on December 1st, 2020 through February 28th, 2021."

8 See Bourla-48, EMA, Assessment report on the annual renewal of the conditional marketing authorization (Comirnaty), 2021, available via www.ema.europa.eu/en/documents/variationreport/comirnaty-h-c-5735-r-0046-epar-assessment-report-renewal_en.pdf, p. 16.

9 See Bourla-49, Reuters, Pages of suspected side effects released about Pfizer's COVID-19 vaccine [...], March 17th 2022: "The FDA has confirmed that "In fact, reviews by FDA and CDC have determined that the vast majority of the deaths reported are not directly attributable to the vaccines. FDA requires healthcare providers to report any death after COVID-19 vaccination to VAERS, even if it's unclear whether the vaccine was the cause.", available at www.reuters.com/article/lactcheck-coronavirus-pfizer-idUSL2N2VK1G1/.

10 See Exhibit 40 to the Summons, p. 7.

11 See SOD of the State et al., section 3.6 and SOD of Bourla, section 3.3.4.

12 In the incidental judgment of your court of October 16th, 2024, it is stated in legal ground. 2.2 and 2.3 that the Gates Foundation is said to be affiliated with Gavi and the World Economic Forum, but that requires nuance. The Gates Foundation is a partner of these organizations but is not part of one corporate relationship with these organizations.

13 Summons, edge no. 204.

14 See: <https://www.who.int/about/governance/world-health-assembly>.

15 See: <https://www.who.int/about/governance/executive-board>.

16 Summons, edge nos. 206-207.

17 Exhibit 66 to the Summons.

18 Exhibit 67 to the Summons.

19 Summons, edge no. 214.

20 See <https://centerforhealthsecurity.org/our-work/tabletop-exercises/clade-xtabletop-exercise> and <https://centerforhealthsecurity.org/our-work/tabletop-exercises/event-201-pandemic-tabletop-exercise>.

21 Summons, edge nos. 215-218.

22 See SOD of Bourla, edge no. 42, footnote 44.

23 Summons, edge nos. 219 and 222. Exhibits 75 and 76 to the Summons.

24 Summons, edge nos. 222-224.

25 Summons, edge nos. 58-59 and 226.

26 M.A.H. van der Woude, in: T&C Criminal Law, commentary on art. 97a Sr.

27 Summons, edge no. 277.

28 H.D. Wolswijk, in: T&C Criminal Law, commentary on art. 300 Sr. See also: HR 9 September 2014, ECLI:NL:HR:2014:2677.

29 See SOD of Bourla, paragraphs 3.2 and 3.3.2.

30 Summons, edge no. 281.

31 Summons, edge no. 286.

32 Summons, edge no. 286.

33 See also: HR April, 21st 1967, ECLI:NL:HR:1967:AB5476, NJ 1967/241, HR June, 22nd 1979, ECLI:NL:PHR:1979:AC6624, NJ 1979/516, HR June, 13th 1980, ECLI:NL:PHR:1980:AC3099 NJ 1981/185 and subsequent case law.

34 Summons edge no. 265.

35 That exhibit 91 to the Summons.

36 Summons, edge no. 266.

37 Asser/Sieburgh 6-II 2021/143b

38 Summons, edge no. 77.