



COURT FILE NO. 2001-14300

COURT COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

APPLICANTS REBECCA MARIE INGRAM, HEIGHTS BAPTIST CHURCH, NORTHSIDE BAPTIST CHURCH, ERIN BLACKLAWS and TORRY TANNER

RESPONDENTS HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF ALBERTA and THE CHIEF MEDICAL OFFICER OF HEALTH

DOCUMENT **WRITTEN INTERROGATORIES FOR DR. HINSHAW**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT Rath & Company
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INTERROGATORY NO. 1: You state that you treat the population of Alberta as your patient. How many individual members of the population of Alberta have committed suicide as a result of the economic devastation the CMOH Orders have inflicted on businesses in Alberta?

INTERROGATORY NO. 2: Regarding paragraph 90, rather than simply monitoring overall suicide rates, what steps have been taken to specifically investigate individual suicides to determine how many of them were specifically caused by economic hardship resulting from CMOH Orders?

INTERROGATORY NO. 3: In paragraph 107, you state that there are “No drug therapies to cure COVID-19 or prevent the spread of SARS-COV-2.” On what basis is this assertion made and what is the source material? Did you personally, or any of your staff, contact

any physician at the Eastern Virginia School of Medicine to discuss the effectiveness of the MATH+ Protocol outpatient treatment? Or any other institutes that have published successful or promising results with COVID-19 prophylactic or outpatient treatments?

INTERROGATORY NO. 4: In paragraph 88 of your affidavit, you note that Alberta has the least restrictive public health measures with the exception of North Dakota. Do you agree that COVID-19 rates in Alberta and North Dakota have been roughly similar since March of 2020 to date? Given that the COVID-19 rates have been roughly similar as between North Dakota and Alberta, how do you justify business closures in Alberta, including restaurants and gyms, when data seems to indicate no difference between jurisdictions that destroy those businesses and those that do not?

INTERROGATORY NO. 5: What is the source of the assertions made in paragraph 110 on masking? Does any of this source material provide caution regarding children being subjected to unsafe levels of CO2 from being forced to rebreathe their own breath over extended periods of time? Does any of the source material speak to adverse psychological effects and developmental impediments of children being prevented from seeing the facial expressions of their teachers and classmates?

INTERROGATORY NO. 6: You reference mortality and COVID-19 mortality throughout your affidavit. On what basis have these analyses and comparisons been made and what is the source of this information? We note that the Alberta Annual Deaths Totals report, published on the Open Alberta website, has not been released to include the 2020 deaths, will you undertake to provide this data?

Dated this 3rd day of August 2021.

RATH & COMPANY, BARRISTERS AND SOLICITORS



Jeffrey R. W. Rath
Counsel for the Applicant Rebecca Marie Ingram