

COURT FILE NO. 2001-14300 800727
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**
PREPARED BY Justice Centre for Constitutional Freedoms
[REDACTED]
Attn:
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[REDACTED]
Counsel for: Heights Baptist Church, Northside Baptist Church, Erin Blacklaws and Torry Tanner

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INTERROGATORY NO. 1: Respecting Paragraph #12, which references The Royal College training materials and exhibits an excerpt from same, please produce an electronic copy of the full publication entitled "Objectives of Training the Specialty of Public Health & Preventative Medicine (2014)" revised in 2018.

INTERROGATORY NO. 2: Respecting paragraph #13, please provide any document from the Ministry of Health setting out the “core set of responsibilities” of what a public health expert does.

INTERROGATORY NO. 3: Please define the terms “human rights”, “social justice”, and “equity” referenced at paragraph #19.

INTERROGATORY NO. 4: Please define “determinants” of health and “health promotion” as referenced in paragraph 12, 14, and 15 of Dr. Hinshaw’s Affidavit.

INTERROGATORY NO. 5: In paragraph #40, Dr. Hinshaw discusses the SARS-CoV-2 virus and how the COVID-19 illness is caused by the SARS-CoV-2 virus. Please provide the source data for the existence of the SARS-CoV-2 virus and the source data for the conclusion that the COVID-19 illness is caused by the SARS-CoV-2 virus.

INTERROGATORY NO. 6: At paragraph #50, Dr. Hinshaw states that “many who are infected experience only mild symptoms followed by a quick return to completely normal health”. She also states that “Covid-19 has also been fatal for over 2300 people in Alberta”. Please provide the source of this estimated death count.

INTERROGATORY NO. 7: Paragraph #55 references “people living with obesity” is among those who are at risk of more severe disease or outcomes from Covid-19. Is there any data showing the percentage of people admitted to hospitals in Alberta with severe symptoms who also had a body mass index of 40 or higher?

INTERROGATORY NO. 8: Paragraphs 65 & 69 compare rates of hospitalization between seasonal influenza and Covid-19. Please confirm the number of ICU stays, hospital stays, and deaths for the 2020-2021 influenza season.

INTERROGATORY NO. 9 : At paragraph #71, Dr. Hinshaw discusses the “variants” of the SARS-CoV-2 virus. Please provide the source data for the existence of the four main variants mentioned, including details about how each of the four variants genetically differ from the original strain.

INTERROGATORY NO. 10: Throughout her Affidavit, Dr. Hinshaw uses the term “pandemic” dozens of times to describe COVID-19. Please provide the current definition of the word “pandemic” upon which Dr. Hinshaw relies, when that definition was adopted, and what the prior definition was.

INTERROGATORY NO. 11: Paragraph #96 states that “equity of opportunity to choose diminishes when the behavioral choices of some members of the population impose risks on others”. Please provide the data which supports this opinion.

INTERROGATORY NO. 12: In paragraph #107, Dr. Hinshaw states there are no drug therapies to cure COVID-19 or prevent the spread. Please provide the source data for this opinion.

INTERROGATORY NO. 13: At paragraph #111, Dr. Hinshaw questions “whether the general population has a true understanding of the risk of Covid-19”. Please provide the data upon which this opinion is based.

INTERROGATORY NO. 14: At paragraph #111, Dr. Hinshaw opines that “Alberta adopted the use of voluntary measures to motivate individuals in taking action, however, not everyone took them seriously or was able to maintain them”. Please provide the data to support his opinion.

INTERROGATORY NO. 15: Also at paragraph #111, Dr. Hinshaw opines that “people do not always protect themselves from disease risk even if they perceive the danger of infection to be high- people have unprotected sex even though they know the risk of sexually transmitted infections is high, for example, during an outbreak”. Please provide the data upon which this opinion is based.

INTERROGATORY NO. 16: Also at paragraph #111, Dr. Hinshaw opines that “the role of conspiracy theories, naysayers, and non-believers, and the power of social media to propagate misinformation and create a groundswell of people who do not believe Covid risk is real and therefore do not change their behaviors”. Please provide the source data upon which this opinion is based.

INTERROGATORY NO. 17: Also at paragraph #111, Dr. Hinshaw opines that “it is understood from other public health interventions, such as immunization, there is a percentage of the population that do not change their behavior, despite knowing the risk, because they don’t believe in the risk or because they exaggerate the risk of the vaccine”. Please provide the source data upon which this opinion is based.

INTERROGATORY NO. 18: Also at paragraph #111, Dr. Hinshaw opines that “societal context plays a role: a disease like COVID, where people need to change behavior and can thereby be inconvenienced, may spur deep-seated beliefs, cultural viewpoints and values (like personal freedom) that oppose behavior change”. Please provide the source data upon which this opinion is based.

INTERROGATORY NO. 19: At paragraph #149, Dr. Hinshaw opines that “teenagers are a much bigger transmission risk than younger children given the normal behavior of the age group”. Please provide the data which supports this opinion.

INTERROGATORY NO. 20: At paragraph #159, Dr. Hinshaw opines “Although our case count numbers, positivity rates and other important indicators have again been brought under control through both Alberta’s public health measures in April and May, and by the level of immunization reached in the province’s population”. Please provide the source scientific data to support this opinion.

INTERROGATORY NO. 21: At paragraph #223, Dr. Hinshaw referenced CMOH Order 29-2021 to “address the escalating frequency of public protests in Alberta”. Please provide


any data showing that such protests resulted in a “spike of cases, particularly driven by the highly contagious variants of concern”.

INTERROGATORY NO. 22: At paragraph #229, Dr. Hinshaw opines that “If these infections were allowed to spread unchecked over a short period of time, the hospitalization volume alone would be sufficient to impair the ability of our acute care system to manage all other health care needs of our population”. Please provide the source data used to support this opinion.

INTERROGATORY NO. 23: At paragraph #236, Dr. Hinshaw opines that it “has now proven to be the case, to have vaccine induced immunity in order to safely achieve herd immunity”. Please provide data to support this opinion.

Dated this 3rd day of August 2021

JUSTICE CENTRE FOR CONSTITUTIONAL
FREEDOMS

By:  _____

LEIGHTON B.U. GREY, Q.C.

Counsel for: Heights Baptist Church, Northside Baptist
Church, Erin Blacklaws and Torry Tanner