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**VIA E-MAIL**

March 10, 2023

Ministry of Attorney General  
Legal Services Branch  
PO BOX 9280 STN PROV GOVT  
Victoria, BC V8W 9J7

**Attention: Julie K. Gibson**

Dear Julie:

**Re: Hsiang et al v. Provincial Health Officer of British Columbia SCBC Vancouver  
Registry No. S224731**

**Hoogerbrug v. Provincial Health Officer of British Columbia SCBC Vancouver  
Registry No. S224652**

We continue to represent the Petitioners in the Hsiang et al and Hoogerbrug Petitions.

As discussed, please find enclosed the draft Further Amended Petitions in the Hsiang and Hoogerbrug matters, along with draft corresponding affidavits, which address the September 12, 2022 Order of the Provincial Health Officer (“PHO”), and the updated factual circumstances relevant to the adjudication of these Petitions.

Please advise whether your client will consent to the filing of the Further Amended Petitions.



In the event that the PHO does not consent to the filing of the Further Amended Petitions, we enclose a draft notice of application for leave to file these materials. If it is necessary to proceed with our application in order to file the amended pleadings, please advise of your soonest availability for a case management conference with Justice Coval in order to schedule the hearing of this application.

Yours very truly,  
GALL LEGGE GRANT ZWACK LLP

A handwritten signature in black ink that reads "Peter A. Gall".

Peter A. Gall, K.C.\*

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