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The Rt Hon Matthew Hancock MP
C/O
The Treasury Solicitor
Government Legal Department
102 Petty France
Westminster
London
SW1H 9G

Sent by email only to:

[REDACTED]
[REDACTED]

Private and confidential

19 March 2021

Dear Ms [REDACTED]

Re: Judicial Review of The Health Protection (Coronavirus, International Travel) (England) (Amendment) (No.7) Regulations 2021 (the "Regulations") – Response to Letter dated 18 March 2021

We refer to your letter dated 18 March 2021.

Our client [REDACTED]

We were pleased to note the Department for Transport's announcement of 15 March 2021 that Portugal will be removed from England's "red list" from 4 am on 19 March 2021.

We require your substantive response to the points raised in the letter before claim dated 5 March 2021 (the "**Letter Before Claim**") to take instructions from our client [REDACTED] (proceeding by her mother and litigation friend [REDACTED]) on her intended judicial review proceedings.

[REDACTED] has been unable to return to her home, family and schooling in England for more than a month since the Regulations came into force on 15 February 2021. [REDACTED] and her family must now make difficult decisions regarding how to facilitate a sudden, and costly, return to England while classroom learning and teacher assessments for GCSEs are underway for [REDACTED]'s peers.

In addition to the impact on [REDACTED], it is clear that the grounds raised in the Letter Before Claim regarding the disproportionate impact of the Regulations and the imposition of charges for "managed self-isolation packages" under the Regulations on children are also of a broader public interest. We note further that since sending our Letter Before Claim, we have been approached by other families who have been affected by the Regulations and who are considering pursuing a claim.

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We look forward to receiving your substantive response to all points raised in the Letter Before Claim, including disclosure of any equality impact assessment.

Reply date for Letter Before Claim

We refer you to the Letter Before Claim, in which we asked that you reply by 15 March 2021 (the “**Proposed Reply Date**”). Having received no substantive response from you or any request for an extension of time by the Proposed Reply Date, we sent you a further letter dated 15 March 2021, requesting that you respond to the Letter Before Claim as a matter of urgency and in any event no later than 4 pm on 19 March 2021 (the “**Extended Reply Date**”).

The Extended Reply Date has provided you with a 14-day timeframe in which to reply to the Letter Before Claim. Given the urgency of the matter we cannot agree to extend this timeframe further. We therefore expect a reply to our Letter Before Claim by 4 pm today Friday 19 March.

Yours sincerely

A handwritten signature in black ink that reads "PGMBM".

PGMBM

Excello Law Limited trading as PGMBM