

District Court of the Northern Netherlands,
Leeuwarden Division, hearing dated 17
September 2025 Case/roll number C/17/190788
HA ZA 2023-172

STATEMENT OF REPLY

Re:

1. Agnes Catharina van der Voort-
Kant, with address for service in
Amsterdam

Defendant No. 16

lawyer: Mr A.H. Ekker v

1. Alwin Minks
2. Margje Geertruida Bosma
3. Robert Willem de Vries
4. Eva Oudakker-Bekkers
5. Mark Gerard Rob Oudakker
6. Monique Tieken
7. George Reginald Vlegels

Claimants

lawyer: Mr P.W.J. Stassen of Leeuwarden

The defendant respectfully submits as follows:

1. INTRODUCTION

1. Kant hereby responds to the arguments put forward by Minks et al. in their reply, in so far as these relate to Kant's statement of defence (see paragraphs 156 to 189 of the statement of defence). Kant explains that these arguments are incorrect or, at any rate, cannot lead to the claims being upheld. Everything that Kant put forward in its statement of defence is expressly maintained. It follows from this alone that all claims by Minks et al. must be dismissed.

2. In addition to the statement of defence, Kant makes the following observations.

Reports of serious adverse reactions

3. Minks et al. argue that the procedures employed by Lareb amount to a 'cover-up' (Statement of Defence, para. 158). They contend that Kant was indeed aware of numerous reports of serious adverse reactions and 'the significant and striking differences between the batches'.
4. This assertion is incorrect. Lareb's analyses found no evidence of serious adverse reactions linked to specific batches. Kant refers to the detailed explanation it has already provided in its statement of defence (Statement of Defence, paras. 17–19 and 26–27).

Internal RIVM memo

5. Minks et al. have submitted three pages from a RIVM memo dated 3 December 2020 (Exhibit 142). According to Minks et al., this memo had a 'sinister purpose', namely to project a preferred reality onto RIVM staff, such that they would believe it is normal for a vaccine to exhibit batch-specific characteristics and serious side effects (CvR, para. 160). These notes allegedly show that Kant was already aware of this on 3 December 2020 (CvR, para. 164).
6. This view is based on an incorrect interpretation of the memo. The memo sets out the rationale for the importance of recording the batch number of the vaccine that recipients receive. The memo was not intended to impose a 'preferred reality'.

Insufficient capacity

7. Minks et al. argue that Kant had organised her organisation in such a way that there was insufficient capacity to process the flow of reports correctly (CvR, para. 165). It would have been clear to Kant in advance that the 'bioweapon' would devastate the health and lives of many people. This is allegedly demonstrated by a graph included by Minks et al. in their reply (CvR, para. 165). According to Minks et al., the trend line shown in this graph demonstrates that an 'increase in deaths' occurred among people who had recently received a Covid-19 injection.
8. This assertion is not supported by the facts. There was no issue of insufficient capacity to process reports. No conclusions can be drawn from the trend lines in the graph regarding deaths caused by vaccines. Lareb has published various reports on the reports received concerning deaths following COVID-19 vaccinations. The conclusions can be found in the reports, which are publicly available on the Lareb website.

Batch EM0447

9. Minks et al. claim that batch EM0477 alone, in the period from 25 January to 5 February 2021, is said to have caused 33 reported deaths (CvR, para. 166). This is allegedly evident from the table presented by Minks et al. at para. 166 of the reply. According to Minks et al., such 'killer batches' were the cause of the vast majority of the deaths (CvR, para. 168).
10. This assertion is factually incorrect. Lareb's analyses of reports of deaths found no evidence of a link to a batch number. No conclusions can be drawn solely from the number of reports of deaths relating to a specific batch number. The expected number of reports depends, amongst other things, on who received vaccines with those batch numbers, at what stage of the vaccination campaign they received them and, of course, on how many people received vaccines with that batch number. Kant has already explained this in its reply (CvA, para. 45).

Safety monitoring consultation

11. According to Minks et al., the fact that Kant allegedly lied about the number of reports relating to a specific batch number, and the conclusions to be drawn from this, is evidenced by an internal email dated 3 May 2021, entitled 'Feedback from the CBG-Lareb-RIVM-VWS 2904 Safety Monitoring Working Group'. This concerns a passage in which Lareb – in short – states that it has received a large number of reports of (deep vein) thrombosis within a very short period of time and that a decision has been taken to conduct further investigation into this. According to Minks et al., Lareb is not in a position to assess causality and all the documents on which the defendants rely on are derived from the 'preferred reality'.
12. This assertion is incorrect and is based on a misinterpretation of the email submitted by Minks et al. It is correct that Lareb had received many reports of deep vein thrombosis and had recommended that further research be carried out into this. Further research was also carried out both in

the Netherlands and internationally. Information on this can be found in Lareb's knowledge base.¹ Kant did not lie about this.

Overviews of recorded adverse reactions by batch number

13. Minks et al. argue that Kant's explanation regarding the summaries of recorded adverse reactions by batch number is incorrect. Kant has stated that such summaries have not been produced to date because this is not useful for safety monitoring (Statement of Defence, para. 27; Statement of Reply, para. 172). According to Minks et al., the preparation of such summaries is, however, part of carrying out an effective 'batch analysis' (CvR, para. 173).
14. This assertion is incorrect. The batch analyses carried out by Lareb are more sophisticated than simply compiling overviews. Using an automated analysis tool, the spectrum of reported adverse reactions per batch number is compared with the spectrum of the other batches. If certain adverse reactions occur more frequently in a specific batch, a further analysis of these reports is carried out. Kant refers to its earlier explanation on this matter (CvA, para. 19).

Fortnightly batch analysis

15. Kant has submitted an article by way of explanation, which describes how safety monitoring specifically for COVID-19 vaccines is carried out. According to Minks et al., this article actually constitutes evidence of the cover-up scheme allegedly employed by Kant. Firstly, Kant herself is one of the authors of this publication, according to Minks et al. Furthermore, the article shows that the fortnightly analysis is 'nothing more' than a fully software-automated process (Statement of Defence, para. 177).
16. This view is incorrect. It goes without saying that Lareb's research staff are the authors of a scientific article by Lareb on the method applied by Lareb. The scientific article was published in a peer-reviewed journal.
Using an advanced automated analysis tool developed by Lareb, the spectrum of reported adverse reactions per batch number was compared with the spectrum of the other batches. If certain adverse reactions occur more frequently in a specific batch, a further analysis is carried out on these reports.
17. Furthermore, the automated process set up by Kant was said to be based on a comparison of the standardised morbidity ratios in the Netherlands with the reporting rate per morbidity category for the COVID-19 vaccinations. According to Minks et al., this amounted to 'deliberately and maliciously comparing apples with pears' (CvR, para. 179). Finally, according to Minks et al., the batch analysis focused exclusively on reports of fever and pain at the injection site, whereas it should have been carried out for all reported adverse reactions (CvR, para. 181).
18. This assertion is not supported by the facts. Minks et al. confuse two different analyses – the batch analyses and the observed/expected analyses. The standardised morbidity ratios were used in the observed/expected analyses and not in the batch analyses. This is described in the aforementioned scientific article by Lareb.
19. In all analyses of reports, consideration was always given to whether there might be a link to a specific batch.

Extremely high number of reports of adverse reactions

20. Minks et al. point out that the number of reports relating to Covid-19 vaccinations was 'relatively extremely high'. In this context, they refer to the much lower reporting rates for adverse reactions to influenza vaccinations (CvR, margin notes 184 to 188). This would appear to show that the Kant was not interested

¹ See <https://www.lareb.nl/vaccin-kennis-pagina/Trombose+na+vaccinatie>

how many reports were made and that no number of reports whatsoever constituted a reason for it to warn the Dutch population.

21. The number of reports received regarding Covid-19 vaccinations was indeed relatively high compared to other vaccinations. The considerable focus on side effects and the ease of reporting likely played a part in this. Furthermore, these were new vaccines and there was a high willingness to report.

22. However, the conclusions drawn by Minks et al. from the foregoing are incorrect. Kant has consistently been fully committed to ensuring adequate safety monitoring of the Covid vaccines.

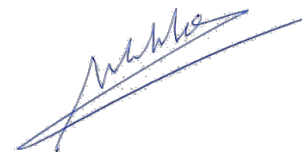
3. OFFER OF EVIDENCE

23. Minks et al. have failed to adduce sufficient evidence to support their claims. As they have not fulfilled the burden of proof incumbent upon them, no further evidence may be admitted. The offer of evidence by Minks et al. must therefore be disregarded. Kant endorses the comments made by the first defendant on this matter (Rejoinder on behalf of Willem Henry Gates III, para. 3.1).

4. CONCLUSION

24. Kant maintains the conclusions set out in the Statement of Defence.

Solicitor



This case is being handled by Mr A.H. Ekker, LL.D.

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