

# Video: Lawyers File Temporary Restraining Order Against FDA Emergency Use Authorization of Vax for Children

By [Thomas Renz](#) and [Kristina Borjesson](#)

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*Lawyer Thomas Renz discusses why he and a group of lawyers have filed a temporary restraining order against various government agencies in an Alabama court to halt vaccinations of children.*

Among their reasons for filing the order: FDA Emergency Use Authorization in this case is illegal; children have virtually zero chance of getting or transmitting covid; the vaccines are experimental and children should not be experimented upon, the vaccines already have an inordinately high rate of serious adverse reactions and deaths.

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## Petition for Temporary Restraining Order

### I. Summary

Plaintiffs bring before the Court today a request for a Temporary Restraining Order (“TRO”) against the U.S. Department of Health and Human Services (DHHS), and the relevant subagencies and personnel including but not limited to the Food and Drug Administration (FDA), Centers for Disease Control and Prevention (CDC), National Institutes of Health (NIH), the DHHS Secretary, the DHHS Assistant Secretary for Preparedness and Response, and the DHHS Vaccines and Related Biological Products Advisory Committee, seeking temporary injunctive relief against any existing or further authorization for use in children under the age of 16, of any of the COVID-19 “vaccines”<sup>1</sup> that have been approved under the Emergency Use Authorization (“EUA”) provided in 21 U.S. Code § 360bbb-3. In this Motion, Plaintiffs ask only that the status quo be maintained – that the EUAs not permit the use of COVID-19 vaccines in children under the age of 16, and that no further expansion of the EUAs to children under the age of 16 be granted prior to the resolution of these issues at trial. Such relief would protect the lives and safety of millions of children in the American public for whom serious illness and mortality from COVID-19 represent a zero percent (0%)

risk statistically, but who face substantial risks from these experimental injections.

Plaintiffs not only face the imminent threat of irreparable injury of various types absent a TRO, but they also represent a diverse cross-section of the American public. They are doctors and other medical professionals. They are parents and children. They are coaches and mentors. They are healthy, and they suffer from underlying conditions. They are from various states. They are from various walks of life. They are individuals and organizations. They are experts and they are lay people. Most or all have been fully vaccinated in the past. And they all have one thing in common. Absent the requested relief, each of their lives stands to be inexorably and irreparably altered forever.

Plaintiffs will bring suit in the near future. The case will challenge the EUAs for the injections on several counts. It will be made clear to the Court in that case, based on the law and well-founded scientific evidence, that: the EUAs should never have been granted, the EUAs should be revoked immediately, the injections are dangerous biological agents that have the potential to cause substantially greater harm than the COVID-19 disease itself, and numerous laws have been broken in the process of granting these EUAs and pushing these injections on the American people.

In the specific instance of minor Plaintiffs under 16, the Court must consider that an “EUA requires that an intervention address a serious or lifethreatening condition<sup>2</sup>, and for known and potential benefits of the intervention to be balanced against the known and potential harms.” There is not even a pretense of a factual basis that COVID-19 represents a serious or life-threatening condition for children under 16, since the CDC acknowledges they face 0% risk of mortality from COVID-19 statistically.

The Complaint will include claims for, inter alia (1) a declaration that the extension of the EUAs for the COVID-19 vaccines making them available for use in children under the age of 16 violates 45 CFR § 46.401, et seq., which applies to “all research involving children as subjects, conducted or supported by [DHHS]”; (2) an order enjoining the use of COVID-19 vaccines in children under the age of 16, until such time as the DHHS Secretary has complied with 45 CFR § 46.401, et seq.; and (3) claims for civil money damages against individual government officials within DHHS, in their personal capacities, for violations of the Constitution, under 42 U.S.C. § 1983.

On May 11, 2021, without any prior notice, the FDA extended the EUA issued for the Pfizer-BioNTech COVID-19 Vaccine for use in 12 to 15 year-old children. Given the extreme exigencies, Plaintiffs are seeking the temporary relief set forth herein even before filing their Complaint. *Studebaker Corp. v. Griffin*, 360 F.2d 692, 694 (2d Cir. 1966); *United States v. Lynd*, 301 F. 2d 818, 823 (5th Cir. 1962) (“The grant of a temporary restraining injunction need not await any procedural steps perfecting the pleadings”); *National Organization for Reform of Marijuana Laws v. Mullen*, 608 F.Supp. 945, 950 n. 5 (N.D. Cal. 1985) (“[o]wing to the peculiar function of the preliminary injunction, it is not necessary that the pleadings be perfected, or even that a complaint be filed, before the order issues”).

## II. Plaintiffs

1. America’s Frontline Doctors (“AFLDS”) is a non-partisan, not-forprofit organization of hundreds of member physicians that come from across the country, representing a range of medical disciplines and practical experience on the front lines of medicine. AFLDS’ programs focus on a number of critical issues, including:

- Providing Americans with science-based facts about COVID-19;
- Protecting physician independence from government overreach;
- Combating the “pandemic” using evidence-based approaches without compromising Constitutional freedoms;
- Fighting medical “cancel culture” and media censorship;
- Advancing healthcare policies that protect the physician-patient relationship;
- Expanding COVID-19 treatment options for all Americans who need them; and
- Strengthening the voices of front-line doctors in the national healthcare conversation.

AFLDS’ core beliefs, shared by each of its member health care professionals, include the following:

- That the American people have the right to accurate information using trusted data derived from decades of practical experience, not politicized science and Big Tech-filtered public health information.
- That critical public health decision-making should take place away from Washington and closer to local communities and the physicians that serve them. They are steadfastly committed to protecting the physician-patient relationship.
- That front-line and actively practicing physicians should be incorporated into the nation’s healthcare policy conversation.
- That safe and effective, over-the-counter COVID preventative and early treatment options should be made available to all Americans who need them. They reject mandatory government lockdowns and restrictions not supported by scientific evidence. They support focused care for the nation’s at-risk population, including seniors and the immunocompromised.

AFLDS, through its member physicians, is deeply committed to maintaining the physician-patient relationship in the face of government encroachment.

Each of AFLDS’ member physicians is also deeply committed to the guiding principle of medicine, “FIRST, DO NO HARM”. They take gravely their ethical obligations to their patients. It is axiomatic that a physician’s duty is to his or her patient.

AFLDS has recommended that the experimental Covid-19 vaccines be prohibited for use in the under-20 age category, and strongly discouraged for use in the healthy population above the age of 20 through the age of 69. These recommendations have two sound and broadly scientific foundations upon which they are based. First, there is the undeniable fact that the Covid19 vaccines are experimental and either lack clinical testing or have presented serious risks for young people in the 12 to 15 age group. The risks and safety evidence based upon such trials as there are, cannot justify the use of these vaccines in younger persons. Because AFLDS has taken the science-based position that it is unethical even to advocate for Covid-19 vaccine administration to persons under the age of 50, its and its membership cannot administer it or support any agency that attempted to do so for juvenile persons in the 12 to 15 age category.

It should be noted here that AFLDS is NOT against vaccines generally as a class of medical interventions. It has praised the speedy progress of the vaccine development program. It has taken care to ensure clarity in its position regarding support of the proper use of approved vaccines and the proper application of emergency use authorizations. It holds

sacrosanct the relationship between doctor and patient where truly informed decisions are to be made, taking into consideration all of the factors relating to the patients' health, risks, co-morbidities and circumstances.

Given these considerations it would be grossly unethical and therefore impossible for AFLDS members to stand idly by while their patients and their patients' families are subjected to the imminent risk of experimental COVID-19 vaccine injections being administered to minor children. If the EUAs are allowed to stand unrestrained and extended to young children in the 12-15 year age group, AFLDS member physicians will be forced into further untenable positions of unresolvable conflict between their ethical and moral duties to their patients, and the demands of many of the hospitals in which they work.

Many of AFLDS member physician's employers subscribe to and follow the recommendations of the American Medical Association ("AMA"). In a special meeting in November of 2020, the AMA's Council on Ethical and Judicial Affairs, updated a previously published Ethics Opinion in the AMA Code of Medical Ethics as opinion 8.7, "Routine Universal Immunization of Physicians."

In this updated opinion, the astonishing position was taken that not only do physicians have an ethical and moral obligation to inject themselves with the experimental COVID-19 vaccination, but they also have an ethical duty to encourage their patients to get injected with the experimental COVID-19 vaccination. The ethics opinion repeatedly uses the phrase "safe and effective" as a descriptor for the experimental COVID-19 vaccination.

The AMA's ethics opinion goes on to state that institutions may have a responsibility to require immunization of all staff!

"Physicians and other health care workers who decline to be immunized with a safe and effective vaccine, without a compelling medical reason, can pose an unnecessary medical risk to vulnerable patients or colleagues," said AMA Board Member Michael Suk, MD, JD, MPH, MBA. "Physicians must strike an ethical balance between their personal commitments as moral individuals and their obligations as medical professionals."

The ethical opinion adopted by the AMA House of Delegates says that doctors "have an ethical responsibility to encourage patients to accept immunization when the patient can do so safely, and to take appropriate measures in their own practice to prevent the spread of infectious disease in health care settings.

[. . .]

"Physician practices and health care institutions have a responsibility to proactively develop policies and procedures for responding to epidemic or pandemic disease with input from practicing physicians, institutional leadership, and appropriate specialists," says the updated opinion. "Such policies and procedures should include robust infection-control practices, provision and required use of appropriate protective equipment, and a process for making appropriate immunization readily available to staff. During outbreaks of vaccine-preventable disease for which there is a safe, effective vaccine, institutions' responsibility may extend to requiring immunization of staff. 3 (emphasis added)

It is clear from this ethics opinion that AFLDS member physicians would be considered by their employers to be both morally and ethically bound by a duty to encourage 12-15 year old minors to receive the experimental COVID-19 vaccination injection.

The AMA even offers a “COVID-19 VACCINE SCRIPT FOR PATIENT INQUIRIES”.<sup>4</sup> Despite being styled as a script for inquiries, the script clearly intends for phone messages and office websites to lead with the following message for every caller, not simply those who wish to inquire about vaccines.

The proposed script reads: “We are encouraging our patients to receive the COVID-19 vaccine when it is available and offered to them.”<sup>5</sup>

To the extent that the AFLDS member physicians either lack control of their office website or telephone system, or are simply unaware of the message that has been placed there absent their knowledge and consent, the member physicians will have been forced unwittingly into an utterly untenable position. Such would create an unresolvable conflict for the member physicians, and deep confusion for their patients, who would thereby be receiving irreconcilable and contradictory messages from the same office.

To illustrate just how unresolvable these conflicts are, it is necessary to consider the massive power of big pharmaceutical companies over the institutions who employ the physicians and the ease with which a physician’s career can be destroyed through widely unregulated reporting which opens an investigation that can and often does render the physician virtually unemployable. Not only do physicians have to choose between their ethical obligations to their patient to do no harm and their current job; the reality is that many of them will be choosing between their patients and their medical career.

It is critical to point out that for AFLDS member physicians, the practice of medicine is not simply a job. Neither is it merely a career. Rather, it is a sacred trust. It is a true high calling that often requires a decade or more of highly focused sacrificial dedication to achieve. The depth and the horror of the bind that this ethics opinion places the member physicians of AFLDS in, simply cannot be overstated.

To grasp the irreparable nature of the harm they face, one must consider the ease with which even an anonymous report can be made that may injure or haunt a physician’s career.<sup>6</sup> The National Physicians Database (“NPDB”) was created by Congress with the intent of providing a central location to obtain information about practitioners. However, as Darryl S. Weiman, M.D., J.D. pointed out, the “black mark of a listing in the NPDB may not accomplish what the law was meant to do; identify the poor practitioner.”<sup>7</sup> Weiman goes on to point out that “It is the threat of a NPDB report which prevents the open discussion, fact-finding, and broad based analysis and problem solving which was the intent of the meaningful peerreview of the HCQIA.”<sup>8</sup>

The gross imbalance of equities between an individual physician and the various large institutions and pharmaceutical companies which exert tremendous sway over his or her professional calling has many physicians fearful of pushing back against such ethical binds as have been described above.<sup>9</sup> Many physicians have a family and medical school debts to consider and should never be forced into such a bitter double bind.

The types of harm the AFLDS member physicians are inevitably subjected to by this extension of the EUAs to inject 12-15 year old minors with the experimental COVID-19

vaccine is truly irreparable. Such harm strikes at the moral and ethical underpinnings of their calling as a physician and drives irreparable wedges into the sacred doctor-patient relationship that cannot be healed and certainly cannot be addressed with monetary damages.

2. Dr. Scott Jensen, MD is a board-certified family medicine physician of 40 years. Dr. Jensen resides and practices in the state of Minnesota, where he was honored as the “Minnesota Family Physician of the Year” in 2016. Dr. Jensen is well aware the children in the 0-16 year old age group have a 0% chance statistically of dying from COVID. As to the EUAs for the experimental COVID-19 vaccines, Dr. Jensen is keenly aware of the risks and benefits of these investigational agents as well as the current vaccine schedule for other diseases. Given that the statistical chance of death for children ages 0 to 16 is 0%, Dr. Jensen believes it would be reckless to subject anyone in that age group to the experimental COVID-19 vaccine. To recommend something that he considers reckless would violate his oath as a doctor and place him in an untenable position. It would place his young patients in that age group at risk and create similar conflicts to those described in the preceding paragraphs relating to the AFLDS member physicians. In addition, and based on the facts and statistics set forth in Dr. Jensen’s Declaration attached hereto and incorporated herein by reference as Exhibit A, Dr. Jensen believes the use of coercion in the 0-16 year old age group that is not at risk of harm from COVID-19 would irreparably undermine public trust in all vaccines. He therefore requests an immediate temporary restraining order to halt the extension of the EUAs of the experimental COVID-19 vaccine for any and all ages under 16.

3. Ellen Millen (Ellen) is a resident of Huntsville, Alabama. Ellen is the Guardian of three siblings ages 5, 4 and 4. These children have been entrusted to her by Child Protective Services and she is responsible for making medical decisions for them. Ellen has obtained a medical exemption for vaccines and neither she nor their biological parents wish the children to receive the experimental COVID-19 vaccination. Ellen stands not only for the children currently in her care but for those who may be placed in her care in the future. She stands for her 22-year-old son and four other children who are unable to stand for themselves in opposing the application of the experimental COVID-19 vaccination to children of all ages who are at NOstatistical risk of death from COVID-19. Without a temporary restraining order as requested in this motion Ellen knows that the children in her care will face overwhelming pressure to receive the experimental COVID-19 vaccination injection from friends, parents of friends, sports organizations, summer camps, schools and colleges. The fear and pressure that this fragile at-risk population of children will be subjected to if the temporary restraining order is not granted is greater than that which is often faced by children from intact nuclear families. The nature of their placement outside of their home and away from their biological family leaves them particularly susceptible to the pressures and the fear mongering that they will receive from peers and authority figures. The harm that they will undergo emotionally, mentally, and/or physiologically is precisely the type of harm considered irreparable by the law in this case. The trauma that is created in this type of a situation will quite likely be carried for life, and no amount of damages can possibly erase the effects. Ellen’s Declaration is attached hereto and incorporated here by reference as Exhibit B. Ellen seeks an immediate temporary restraining order to halt the extension of the EUAs for the experimental COVID-19 vaccines for any and all children 15 years old and younger.

4. Jody Sobczak (Jody), of Huntsville Alabama, is the father of two minor children ages 15 and 17. Jody has researched the experimental COVID-19 vaccines and fiercely opposes their

use in healthy children of any age. He knows that his own children are placed at immediate and irreparable risk of harm by extending the EUAs for the experimental COVID-19 vaccines to adolescents. Jody is well aware that there are safe and effective alternative treatments readily available, and he adamantly opposes the suppression of those treatments in favor of experimental and potentially life-threatening agents. Jody's Declaration is attached hereto and incorporated herein as Exhibit C. Jody seeks an immediate temporary restraining order to halt the extension order of EUAs for the experimental COVID-19 vaccines for any and all children 15 years old and younger.

5. Deborah Sobczak (Deborah), of Huntsville Alabama, is the mother of two minor children ages 15 and 17. Deborah has researched the experimental COVID-19 vaccines and also fiercely opposes their use in healthy children of any age. She knows that her own beloved children are placed at immediate and irreparable risk of harm by extending the EUAs of the experimental COVID-19 vaccine to adolescents. Deborah is well aware that there are safe and effective alternative treatments readily available and she adamantly opposes the suppression of those treatments in favor of experimental and potentially life-threatening agents. Deborah's Declaration is attached hereto and incorporated herein by reference as Exhibit D. Deborah seeks an immediate temporary restraining order to halt the extension of the EUAs for the experimental COVID-19 vaccines for any and all children 15 years old and younger.

6. Lyle Bloom (Lyle), of Huntsville, Alabama, is the father of two children ages 10 and 16, and the father of one young adult age 21. Lyle has researched the experimental COVID-19 vaccines and fiercely opposes their use in healthy children of any age. He knows that his own children are placed at immediate and irreparable risk of harm by extending the emergency use authorizations of the experimental COVID-19 vaccine to adolescents. Lyle is well aware that there are safe and effective alternative treatments readily available and he adamantly opposes the suppression of those treatments in favor of experimental and potentially life-threatening agents. Lyle's duly executed Declaration is attached hereto and incorporated herein as Exhibit E. Lyle seeks an immediate temporary restraining order to halt the extension of EUAs of the experimental COVID-19 vaccines for any and all children 15 years old and younger.

7. Julie Bloom (Julie), of Huntsville Alabama, is the mother of two children ages 10 and 16, and the mother of one young adult age 21. Julie has researched the experimental COVID-19 vaccines and also fiercely opposes their use in healthy children of any age. She knows that her own beloved children are placed at immediate and irreparable risk of harm by extending the EUAs for the experimental COVID-19 vaccines to adolescents. Julie is well aware that there are safe and effective alternative treatments readily available and she adamantly opposes the suppression of those treatments in favor of experimental and potentially life-threatening agents. Julie's duly executed Declaration is attached hereto and incorporated herein as Exhibit F. Julie seeks an immediate temporary restraining order to halt the extension of EUAs for the experimental COVID-19 vaccines for any and all children 17 years old and younger.

8. Andrea McFarlane, RN (Andrea) of Huntsville, Alabama currently works as a trauma/ICU nurse at Vanderbilt. She is the mother of 4 children, 10, 12, 14 and 16. As a nurse, Andrea has seen tremendous pressure placed on staff to get the experimental COVID-19 vaccines. Even medical staff that have had COVID-19 are pressured relentlessly to take the experimental COVID-19 vaccines. It is well known among the staff that taking the experimental COVID-19 vaccines will leave you sick for days, and they accommodate for the

expected sick reactions in their staffing plans. Andrea is also in school and as a student she is pressured and incentivized to get “vaccinated”. As a mother, Andrea knows only too well the tremendous pressure her boys will be under to get “vaccinated”. They will be under social and school pressure and Andrea deeply fears for their safety. She has studied the vaccine. She knows that it is experimental and that it has proven harmful in many cases. She knows that her children are not at risk from COVID-19 and believes it should be illegal and that it is immoral to give an experimental and untested vaccine to children who are not at risk. She believes that if the TRO is not granted, not only will her children be at grave risk of irreparable harm, but she will be subjected to pressure in her profession to comply with an immoral policy. We know that the AMA through their ethics opinion set forth above in this Motion has already opined that institutions will likely have an obligation to require that their staff get injected with the experimental COVID-19 vaccinations. Should this happen, Andrea will be unable to work because she will not follow a policy that she believes is immoral. Andrea’s duly executed Declaration is attached hereto and incorporated herein by reference as Exhibit G. Andrea is asking that this Court immediately impose the requested TRO in order to protect her children as well as herself from the grave risk of immediate and irreparable harm.

9. Jennifer Greenslade (Jennifer), of Replap, Alabama, has an autoimmune disorder for which she takes medicine on a daily basis. She has researched the experimental COVID-19 vaccines and is aware that to take it would be to inject herself with an unknown agent that is largely unstudied but which carries risk to anyone with an autoimmune disease. She fears deeply for her own health and the health of her children, ages 9 and 12. The type of disease she has can be hereditary and nobody knows how it might interact with her children’s health, whereas COVID-19 itself poses no risk of death to her children whatsoever. Jennifer has two cousins who did allow themselves to be injected with the experimental COVID-19 vaccines. They were both healthy prior to the injection. They became extremely ill after being injected and spent weeks on the brink of death in the ICU. They are now out of the ICU but neither of them can walk and they require care from their children. This type of vaccine related injury constitutes irreparable harm. Her cousins were in good health and now they are unable to walk even though they survived the initial onslaught of the vaccine related sickness. Jennifer’s health is not strong and her children may have inherited her autoimmune disorder. If they are pressured or mandated to take the vaccine and experience reactions similar to Jennifer’s cousins’ reactions, she and her children might not survive. For a mother of two small children it is a stark and terrifying concern to think that they may be killed or paralyzed or that she may be rendered unable to care for them or worse. Jennifer’s duly executed Declaration is attached hereto and incorporated herein by reference as Exhibit H. She is seeking an immediate temporary injunction on behalf of herself, her children, and other similarly situated parents against the extension of the EUAs for children 15 and younger, who are at no risk from COVID-19.

10. Steven M. Roth, MD (Dr. Roth), of Alabama, has been a practicing emergency medicine physician for 13 years. Aspart of his practice, Dr. Roth sees patients of all ages. He is aware of the risks and benefits of these investigational agents as well as the current vaccine schedule for other diseases. Based on the most recent numbers from the CDC from May 5, 2021, anyone under the age of 16 has statistically NO risk of dying of Covid-19.

Dr. Roth has not seen a COVID-19 patient in many months, but he is currently seeing many patients who come to the emergency department as post-COVID-19 injection patients. All of these patients came in with COVID19 like symptoms that occurred within 48 hours of the



injection. All these patients required hospital admission. Several of these patients progressed to death, caused by the vaccine.

Dr. Roth's concern is that based upon what he is seeing in the community, and because of the schools asking that students take the experimental COVID-19 injections and putting obstacles around those who do not take it, young people are being pressured to take an experimental injection, and many are succumbing to that pressure. This is deeply disturbing to Dr. Roth, because it is universally known that children virtually never die from COVID-19 and given that children have a very strong immune system, they are more likely than adults to have an over-reaction to the shot. This means that there is not only no benefit, but also an increased risk for children who receive the experimental COVID-19 injections. Also, with all prior viruses and vaccines, it has been accepted in the medical community that natural immunity is superior to vaccination, and there is no basis to believe that would be different with SARS-CoV-2. Because of these factors, it is actually not preferable to give the vaccine even if it was definitely safe, which these are not.

In addition, Dr. Roth is extraordinarily concerned that there have been no animal studies, nor long-term studies, of the COVID-19 vaccines, especially since prior coronavirus vaccines all caused death in the animals subjected to them.

Dr. Roth is aware of many thousands of physicians who agree with him, but who are under great pressure to say nothing. Dr. Roth has chosen to speak out now, at great personal cost to himself, because the alternative is unbearable. Dr. Roth could not live with himself if he stood by and allowed these experimental COVID-19 injections to be inflicted upon children universally, resulting in death and destruction over the years. He considers it immoral and unconscionable that this experimental therapy will be given to children. Not only are children NOT at risk of death from COVID-19, but they are also NOT mini-adults. Their organs are still forming, and they are even more vulnerable than adults to developing autoimmune disease in this situation.

Dr. Roth would be deeply and directly affected by a change in FDA guidelines regarding vaccines for young people, and as a result he is imploring this Court to grant an immediate TRO to halt the approval of the infliction of the experimental COVID-19 injections upon children. In addition to the direct threat of irreparable harm posed to Dr. Roth's young patients, an additional unwelcome consequence of using coercion to mandate or pressure the participation of healthy young people who are statistically at NO risk is the risk of sharply reducing the public trust in all vaccines. This would also create what can only be described as irreparable harm to the public generally. Dr. Roth's duly executed Declaration is attached hereto and incorporated herein by reference as Exhibit I.

11. Matt Schweder (Matt) of Lexington, Kentucky, is the father of one minor daughter, age 15, and an adult son, age 25. Matt's son is in the Advanced Nurse Practitioner Program at Vanderbilt University. Matt's daughter is an active student and plays soccer for her high school. Matt has, until recently, coached girls select soccer for a number of years and he is very aware of the extraordinary power of peer pressure in the life of young adolescents. Matt's daughter is subjected to a barrage of peer pressure regarding vaccinating, which is a constant source of conversation for her friends, who have been taught to fear that which should hold no fear. In addition, her school system bombards her with weekly emails, pressuring and shaming her and her family into allowing themselves to be experimented on with the experimental COVID-19 injections. The pressure is so intense that one of Matt's daughter's friends was forced to take the injection by his own mother, against his will, at the

age of 16, and Matt's daughter had to undergo the trauma of knowing that her friend had become part of this dangerous human experiment even though he was adamantly opposed to doing so. Matt has conducted his own research into COVID-19, and he is well aware that children under the age of 16 have a 0% chance statistically of dying from COVID-19. Matt knows that safe and effective treatments for COVID-19 are available and he fiercely opposes the suppression of these treatments in favor of using untested and potentially life-threatening agents against children who are not at risk. As a father, Matt has witnessed the growing concern his son has, that his school or potential employer might decide to make the experimental agents mandatory, which would put his education to waste. The damages that Matt and his family face are irreparable if this EUA is permitted to be inflicted upon minor children, whose only risk of death comes from the vaccine itself. Therefore, Matt urgently moves this Court to find for his children and the children of America and immediately grant the TRO sought by this Motion. Matt's Declaration is attached hereto and incorporated herein by reference as Exhibit J.

[Read the full document here.](#)

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