

Appendix FF

Order 58, rule 15

No. 1

SUPREME COURT**Application for Leave and Notice of Appeal****For Office use**

Supreme Court record number of this appeal	
Subject matter for indexing	Application for Leave to Petition the High Court challenging the Validity of the Provisional Referendum Certificate of the 34 th Amendment to the Constitution (Marriage Equality) Bill 2015 And Articles 46 & 47 of the Constitution.

Leave is sought to appeal from	<input checked="" type="checkbox"/> The Court of Appeal	<input checked="" type="checkbox"/> The High Court
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Application for Leave to Petition the High Court challenging the Validity of the Provisional Referendum Certificate of the 34th Amendment to the Constitution (Marriage Equality) Bill 2015 And Articles 46 & 47 of the Constitution.

Maurice J. Lyons	AND	Ireland & The Attorney General, Ríona Ní Fhlanghaile the Referendum Returning Officer.	
High Court Record Nr	2015 293JR	Court of Appeal Record Nr	2015 299
Date of filing	27 th . August 2015		
Name(s) of Applicant(s)/Appellant(s)	Maurice J. Lyons		
Solicitors for Applicant(s)/Appellant(s)			
Name of Respondent(s)	Ireland & The Attorney General, Ríona Ní Fhlanghaile the Referendum Returning Officer.		
Respondent's solicitors	The Chief State Solicitors Office		
Has any appeal (or application for leave to appeal) previously been lodged in the Supreme Court in respect of the proceedings?			
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
If yes, give [Supreme Court] record number(s)			

Are you applying for an extension of time to apply for leave to appeal?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If Yes, please explain why		

1. Decision that it is sought to appeal

Name(s) of Judge(s)	Mr. Justice Ryan Mr. Justice Peart Mrs. Finlay Geoghegan
Date of order/ Judgement	30 th July 2915

2. Applicant/Appellant Details

Where there are two or more applicants/appellants by or on whose behalf this notice is being filed please provide relevant details for each of the applicants/appellants

Appellant's full name	Maurice J. Lyons
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Original status

<input type="checkbox"/>	Plaintiff
<input checked="" type="checkbox"/>	Applicant
<input type="checkbox"/>	Prosecutor
<input checked="" type="checkbox"/>	Petitioner

<input type="checkbox"/>	Defendant
<input type="checkbox"/>	Respondent
<input type="checkbox"/>	Notice Party

Solicitor			
Name of firm			
Email			
Address	Telephone no.		
	Document Exchange no.		
	Ref.		
Postcode			

How would you prefer us to communicate with you?

Document Exchange E-mail
 Post Other (please specify)

Counsel			
Name			
Email			
Address	Telephone no.		
	Document Exchange no.		
	Postcode		

Counsel			
Name			
Email			
Address	Telephone no.		

		Document Exchange no.	
Postcode			

If the Applicant / Appellant is not legally represented please complete the following

Current postal address	In Refuge c/o St. Alexius, Churchfields, Knock, Co. Mayo.
e-mail address	mauricejblyons@gmail.com
Telephone no.	086 2444907

How would you prefer us to communicate with you?			
<input type="checkbox"/>	Document Exchange	<input checked="" type="checkbox"/>	E-mail
<input checked="" type="checkbox"/>	Post	<input type="checkbox"/>	Other (please specify)

3. Respondent Details

Where there are two or more respondents affected by this application for leave to appeal, please provide relevant details, where known, for each of those respondents

Respondent's full name	Ireland & The Attorney General, Riona Ní Fhlanghaile the Referendum Returning Officer.
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Original status

<input type="checkbox"/>	Plaintiff
<input type="checkbox"/>	Applicant
<input type="checkbox"/>	Prosecutor
<input type="checkbox"/>	Petitioner

<input type="checkbox"/>	Defendant
<input checked="" type="checkbox"/>	Respondent
<input type="checkbox"/>	Notice Party
<input type="checkbox"/>	

Solicitor: Mr. Mark Tierney			
Name of firm	Chief State Solicitors Office		
Email	mark.tierney@csso.gov.ie		
Address	Osmond House	Telephone no.	01 4176207
	Little Ship Street	Document	
	Dublin 8	Exchange no.	
		Ref.	
Postcode			

How would you prefer us to communicate with you?

<input type="checkbox"/>	Document Exchange	<input type="checkbox"/>	E-mail
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Post

Other (please specify)

Counsel			
Name	Michael McDowell SC		
Email			
Address	Telephone no.		
	Document		
	Exchange no.		
Postcode			

Counsel			
Name			
Email			
Address	Telephone no.		
	Document		
	Exchange no.		
Postcode			

If the Respondent is not legally represented please complete the following

Current postal address	
e-mail address	
Telephone no.	

How would you prefer us to communicate with you?

Document Exchange	E-mail
Post	Other (please specify)

4. Information about the decision that it is sought to appeal

<p>It is sought to appeal from the entire decision of the Court of Appeal</p> <p>1 The Court of Appeal failed to consider and thereby refused to grant the following reliefs:</p> <p>1.1 That the application for leave to submit a Petition in the national interest by its nature is exempt from stamp duty.</p> <p>1.2 That there be a pre-emptive order for cost to me and that there be no costs against me.</p> <p>1.3 That my application and that of Mr. Gerry Walsh be not joined.</p> <p>1.4 That the proposal, the subject matter of the 34th Amendment to the Constitution (Marriage Equality) Bill 2015, was impermissible where it is in direct opposition to christian teaching as it would be repugnant to the christian ethos of the Constitution that the Supreme Court itself has acknowledged.</p> <p>1.5 The decision of the High Court refusing my application to state a case to the Supreme Court - that there must be a window of opportunity for the people, once the Bill has</p>

been passed, to amend the Constitution as the people are precluded from drafting it - be set aside.

In relation to the transcript provided by the Chief State Solicitors Office of the application heard before the Court of Appeal 30th July 2015:

- 2 At p 187 lines 23 to 28 the President agrees with Mr. McDowell that Ireland is in effect a procedural democracy and the Oireachtas is not subject to the sovereignty of the people. By relying on the 1994 Referendum Act he asserts that there is no written test anywhere to support my contentions. He alludes to statute law as if it were not subject to the unenumerated principles and maxims of law upon which statute must rest.
- 3 At p 188 line 6 to 13 the President paraphrases me in the form of direct quotes which I never made and in doing so invents a “strawman” argument which he then proceeds to knock down.
- 4 The President asserts that we can take a constructive view of the Constitution without looking at the principles upon which it stands.
- 5 At p188 lines 15 to 21 The President uses ad hominem remarks to claim my argument represents a fundamental misunderstanding of how the constitution provides for the initiation of a Referendum. He fails to specify what the proper understanding is in relation to the outline understanding I have taken great pains to present and falls back upon ad hominem remarks instead. His only supporting evidence is in reference to the powers of the Oireachtas in enacting “ordinary” - but not constitutional- legislation. The President fails to acknowledge that the amendment of the Constitution is a unique legal procedure that is governed by the rules of an institution. (See below no 5 “Reasons why the Supreme Court should grant leave to appeal”)
- 6 At p188 line 28 onward in relation to my application to have the case stated to the Supreme Court both the High Court and the Court of Appeal seem to be saying that I do not have a remedy in the 94 Act to deal with the way the state has corrupted the referendum amendment process and that is why I asked in the High Court to state the case which was refused. The Court of Appeal never addressed the absence of such a remedy either. The Sovereign people are clearly entitled to a remedy including a recourse to criminal prosecution but also to one where the Referendum process was not conducted according to law. Where it violates the Sovereignty of the people, the sovereign People must have the remedy to have it declared null and void.
- 7 At p189 line 24 on to the end of p190 In relation to introducing irrationalities that would mean that the amendment is in conflict with the text that is already there and intended to remain the President provided no citation of his own to outweigh the citation of his own to outweigh the citation provided by me by Barrington J. in *Riordan v An Taoiseach (No 2)*

[1999] 4IR 343 at pages 360/361 quoting *Finn v Attorney General* [1983] IR 154. Here the Supreme Court clearly approves of the principle that the people are bound by their own Constitution and cannot act in such a way so as to be in conflict with it. The argument put to the Court of Appeal was that introducing glaring irrationality on its face would usurp the sovereignty of the people by empowering the courts to decide on an interpretation of their rights to deal with the conflict and the Court of Appeal appeared to endorse that usurpation.

- 8 The President, taking the view of Mr. McDowell, asserts that the Court of Appeal is not entitled to tell the Oireachtas what should be in the Bill to amend the Constitution and that therefore if the Oireachtas has acted improperly the People have no remedy to seek a finding to that effect.
- 9 In relation to the argument that the proposal was in direct opposition to Christian teaching and that it is impermissible where the Supreme Court acknowledges in *Norris v. Attorney General* [1983] IESC 3, [1984] IR 36 that the Constitution has a Christian ethos the President had nothing to say and failed to address that argument.
- 10 At p191 The President rejected the argument that the People must be given informed consent and that they must know the consequences of the proposal despite the fact that the proposal as it stands is not a lawful statement and will not be until a statute is in place which entitles such a marriage to be contracted. Such a statute, by definition, will be controversial as it must introduce provisions that significantly contradict the law presently governing marriage and its nullity that has subsisted for centuries. Unless and until the nature and form of such a statute is formally provided to the People by way of their notice clearly they are bereft of the capacity to give their informed consent.

5. Reasons why the Supreme Court should grant leave to appeal

1. Bunreacht na hÉireann – the Constitution of Ireland, 1937 acknowledges that the People in Ireland are sovereign and that the Constitution belongs to them. The three organs of the State – the judiciary, the legislature and the executive/Government – are their servants.
2. The Oireachtas has enacted legislation in the form of the Referendum Act 1994 which is being interpreted in a way that does not properly respect the position of the sovereign people who placed their names on the Presidential Register of Electors as rights holders over the Constitution. Such people in effect enroll themselves into the body or institution that has the right to decide on the nature and content of the Constitution. The applicable law for such an institution is that for any decision to be promulgated by them there must be evidence that it represents the collective will of its members and this is demonstrated where a majority of them give their consent to a proposal put to them by one or more of the members.
3. The Constitution calls upon the President of Ireland and the Supreme Court to maintain and protect the position of the people of Ireland as sovereign and to quash and nullify any attempts by any of the three organs of the State to usurp that sovereignty. Any matter where the sovereignty of the people is being usurped is clearly one that requires the protection of the Supreme Court and the President of Ireland.
4. Article 47.1 of the Constitution, “Referendum” acknowledges the right of certain members of the sovereign Irish People – citizens who have placed their name on the Presidential Register of Electors – to have a proposal for an amendment of the Constitution, by and from them, referred back so they can formally give consent, if they so wish, by placing their mark on the ballot paper provided.

5. Every such member has the right to consent to or to ignore such a proposal. Each member who deems such a proposal not worthy of their consideration is entitled to ignore it and this position must be respected and counted. The State is not at liberty to discount, to dispense with or ignore their position.
6. Article 47.1 acknowledges that where a majority, i.e. the number of such members who give consent outweighs the remainder of the People on the register who did not give their consent, that a proposal to amend the Constitution can be passed.
7. Following a referral to the sovereign People by Article 47.1, evidence of the collective will of the members of the sovereign People of Ireland, must be competently communicated to the President for his audit.
8. The Referendum Returning Officer retains, for a period of six months, the information from which the President must satisfy himself of the collective will of the sovereign People of Ireland and thereby comply with Articles 46 and 47 of the Constitution.
9. The Provisional Referendum Certificate dated 25 May A.D. 2015, published in Iris Oifigiúil Number 42 on 26 May A.D. 2015 by Riona Ni Fhlanghaile, Referendum Returning Officer in relation to the Thirty-fourth Amendment of the Constitution (Marriage Equality) Bill 2015 fails to disclose the necessary data – including the number of members who consented, if any and the number on the register who did not – for the President to be satisfied that the threshold required by Articles 46 and 47 of the Constitution has been met.
10. The Irish text in Articles 46 and 47 of the Constitution, makes clear that the President's duty, as the elected representative and auditor of the referendum for the sovereign People of Ireland, is to discover immediately the number of the sovereign People on the register and if a majority of that number of those members gave their informed consent according to law. Only then can he fulfil his duties to God and the sovereign People of Ireland, as required by Articles 46 and 47 and promulgate a proposal as a lawful amendment to the Irish Constitution.
11. The matters raised in this application for leave are of National importance, have not been properly addressed by the High Court or the Court of Appeal and the intervention of the Supreme Court is necessary to protect the sovereignty of the People of Ireland and their Constitution.

6. Ground(s) of appeal which will be relied on if leave to appeal is granted

- 1 In the Judgement of Murnaghan J. in *Byrne v Ireland & the Attorney General* [1967] IR241 it says:

"This Constitution was passed by the Oireachtas and submitted to the people in a referendum. It was enacted by the people on 1st July 1937 and came into operation from 29th December 1937.

It can now only be amended by way of a referendum by a decision of the people. Therefore, the Constitution and its form are the creation of the people and depend upon the will of the people both for its existence and the determination of its form from time to time by way of the referendum provided for by Articles 46 and 47 of the Constitution.

The State is, in its turn, recognised by the Constitution. Its powers and obligations are determined by it. It is thus to be seen that it is the people who are paramount and not the State. Such a conclusion is inconsistent with any suggestion that the State is sovereign internally. In addition, it would appear to me that there are to be found in the Constitution itself further indications that the powers of the State are limited and confined in a fashion which is inconsistent with the State being of a sovereign nature."

- 2 The sovereign People of Ireland are entitled to challenge whatever the State – the judiciary, the legislature and the executive/Government acting as their servants – does which would interfere with their fundamental rights.
- 3 The proposal to amend the Constitution was not one that the sovereign People of Ireland could properly be asked to consider – Both Mr Justice Kearns and the Court of Appeal refused to acknowledge the position of the sovereign People of Ireland and title to their rights acknowledged in *Bunreacht na hÉireann* in the way the State improperly introduced and conducted the Referendum on the Thirty-Fourth Amendment of the Constitution (Marriage Equality) Bill, 2015.
- 4 Judge Kearns and the Court of Appeal refused to acknowledge evidence of the following:
 - 4.1 That the proposal did not emanate from the sovereign People of Ireland.
 - 4.2 That the sovereign People of Ireland can not be required to provide their veto to their fundamental rights being interfered with and only need to consent to a proposal that they approve of.
 - 4.3 That a proposal that would introduce irrationalities into the face of the text of

the Constitution is not a proposal that the sovereign People of Ireland can properly be asked to consider.

4.4 That the proposal to amend the Constitution was impermissible where it is in direct opposition to Christian teaching as it would be repugnant to the Constitution's Christian ethos that the Supreme Court has acknowledged. Article 6 of the Constitution states:

“All powers of government, legislative, executive and judicial, derive, under God, from the people, whose right it is to designate the rulers of the State and, in final appeal, to decide all questions of national policy, according to the requirements of the common good.”

4.5 That the informed consent of the sovereign People of Ireland could not be given where they are asked to approve of a law yet unknown to them.

4.6 That these grounds meet the threshold for granting leave to present a Petition challenging the validity of the Provisional Referendum Certificate For the Thirty-Fourth Amendment Of The Constitution, (Marriage Equality) Bill 2015 And in The Matter Of Article 46 And 47 Of The Irish Constitution in the following terms.

4.7 That the application for leave to submit a Petition in the national interest by its nature is exempt from stamp duty.

4.8 That the basis for the pre-emptive order for costs is that the application is not for redress from any defendant so there is no beneficial or pecuniary benefit to the Applicant. The application is made entirely in the public interest with the objective of conserving the fundamental rights of the sovereign People of Ireland and their Constitution.

5 His Honour Mr Justice Kearns in his judgement given ex tempore in the High Court stated, when refusing the application for leave to submit a Petition in the national interest, that the general rule is that the “costs follow the issue” and awarded costs for the counsel for the Attorney General, the Referendum Returning Officer. Being an ex parte application for Leave no Respondents were given Notice to take part. Judge Faherty, by order dated 2 June A.D. 2015 directed me to issue and serve a Notice of Motion on the Attorney General and the Referendum Returning Officer. She is therefore responsible for their costs. The Court of Appeal when dismissing my argument on costs and making an order for costs against me gave no reason for doing so.

6 In joining the separate application brought by a Mr Gerry Walshe, High Court Record No: 2015-295-JR with my application, High Court Record No. 2015/293JR against the wishes

of the Applicant herein and without his consent His Honour Justice Kearns exceeded his discretion in claiming it was required to accommodate best practice of case management. By inspection of Mr Walshe's application it is clear that there is no overlap of remedies sought nor grounds with my application for it to be expeditious in joining the two applications. I am entitled to have my application considered on its merits alone and to not be confused or contaminated by another separate application. Again in the Court of Appeal the Court ordered that the application brought by Mr. Walshe and me should be heard as one matter on the grounds of case management and being expeditious to do so. That is not sufficient reason to have done so where the matters are unrelated and have already incurred serious contamination between the cases.

- 7 The principles of law that apply to the ownership and amendment of the Constitution are governed by the law and principles that apply to an institution and the institution that we are referring to is the membership made up of the body of sovereign citizens who have placed their names on the register of Presidential Electors.
- 8 The amendment of the Constitution is an aspect of the management of the internal affairs of this membership. The institution of the membership has stewardship of the Constitution. Nowhere in the Judgement of Mr. Justice Kearns of the High Court nor in that of the Court of Appeal does it acknowledge or accept the function of registering, what it means to be on the register and the rights established by the citizens who have so enrolled themselves into that body.
- 9 Both the High Court and the Court of Appeal have endorsed the opinion of the Attorney General and the Referendum Returning Officer that the elected representatives are themselves entitled to propose an amendment to the Constitution without there being evidence that it is the will of the people to amend their Constitution. I want the Supreme Court to declare the law as to what constitutes a valid proposal.
- 10 The sovereign People are entitled to challenge everything that the Oireachtas does. When the Oireachtas enact ordinary legislation the People are entitled to have it struck down where it is repugnant to the Constitution. The High Court and the Court of Appeal believe that where it comes to an amendment to the Constitution the Oireachtas can pass any bill with impunity. Both courts rejected my assertion that the People must have an opportunity to challenge such a proposal passed by the Oireachtas. As there is no opportunity for the People to contribute directly to the drafting of it and there is no opportunity to challenge it before it is put to the people the only window of opportunity is where the majority of the People may have consented to it but before the President has promulgated it.

10.1 Article 47.1 of the Constitution, “Referendum” acknowledges the right of certain members of the sovereign Irish People – citizens who have placed their name on the Presidential Register of Electors – to have a proposal for an amendment of the Constitution, by and from them, referred back so they can formally give consent, if they so wish, by placing their mark on the ballot paper provided.

10.2 Every such member has the right to consent to or to ignore such a proposal. Each member who deems such a proposal not worthy of their consideration is entitled to ignore it and this position must be respected and counted. The State is not at liberty to discount, to dispense with or ignore their position.

10.3 Article 47.1 acknowledges that where a majority, i.e. the number of such members who give consent outweighs the remainder of the People on the register who did not give their consent, that a proposal to amend the Constitution can be passed.

11 His Honour Justice Kearns and the Court of Appeal dismissed the argument - that each citizen who put their name on the register of presidential electors and did not vote had in effect not consented to this amendment - without giving their reasons other than to state that “the majority Yes vote in this referendum exceeded the No vote by almost half a million people”. Both Courts refused to consider the evidence submitted that both Article 47.1 and Section 40. (1) a of the Referendum Act 1994 must be interpreted Constitutionally and can be so as to weigh the sovereign People of Ireland who cast their approval with those who do not. He refused to accept that a person with fundamental rights could not be required to exercise their veto in order to retain those rights. That is a fundamental principal of law. His Honour Justice Kearns refused to state this matter to the Supreme Court when requested to do so and the Court of Appeal failed to address my appeal of this refusal.

12 The High Court and the Court of Appeal have avoided making a finding as to my claim that the way that the State has interpreted Articles 46 & 47 of the Constitution refuses to acknowledge the sovereignty of the People over the State and allows the State to dispense with the consent of the Sovereign People who placed their names on the register of Presidential electors.

13 The Referendum Returning Officer has been asked and is refusing to confirm the standing of the men and women who she claims initiated the proposal that became the subject matter of the 34th Amendment of the Constitution (Marriage Equality) Bill 2015. As only “members” on the register of Presidential Electors are entitled to propose a change to their own Constitution and until the standing of such members is established the validity

of the proposal and the Referendum is in question. The Court of Appeal when this serious matter was brought to its attention failed to acknowledge and address it.

14 The Referendum Returning Officer has refused to show the standing of men and women who ignored the opportunity to give their consent because they did not believe the proposal was worthy of their consideration. The Referendum Returning Officer in the provisional Referendum Certificate only provides the standing of those citizens for the register of Presidential Electors who believed the proposal was worthy of their consideration and so turned up at the polling stations. Her appearance in the court was on behalf only of these people. The Court of Appeal was told that the Referendum Returning Officer without being able to show her standing as representing all the citizens on the register of Presidential Electors then the Court would not have the jurisdiction to hear her as a Respondent. The Court proceeded as if it had such jurisdiction and heard submissions from her council.

15 This impacts upon the awarding of Costs when one considers that the 1994 Act envisages the granting of Leave to present a petition to be ex-parte, that is without the burden of having to be responsible for the costs of other parties.

Name of solicitor or (if counsel retained) counsel or applicant/appellant in person:

Maurice J. Lyons

Applicant/Appellant in person

7. Other relevant information

Neutral citation of the judgement appealed against *e.g.* Court of Appeal [2015] IECA 1 or High Court [2009] IEHC 608

References to Law Report in which any relevant judgement is reported

Jordan V Minister for Children and Youth Affairs and others [2015] IESC 33

Riordan V An Taoiseach (No 2) [1999] 4 IR 343

Byrne V Ireland & Attorney General IR p241 [1972]

Norris V Attorney General [1983] IESC 3, [1984] IR 36

8. Order(s) sought

Set out the precise form of order(s) that will be sought from the Supreme Court if leave is granted and the appeal is successful:

- 1) I am seeking leave to appeal to the Supreme Court.
- 2) If successful I am seeking Leave to Petition the High Court challenging the Validity of the Provisional Referendum Certificate of the 34th Amendment to the Constitution (Marriage Equality) Bill 2015 And Articles 46 & 47 of the Constitution and to have the law declared on the following matters which impact upon the lower courts' refusals to grant leave.
- 3) A Declaration that the Result of the Referendum on the Thirty-fourth Amendment of the Constitution (Marriage Equality) Bill 2015 taken on 22 May A.D. 2015 should be declared Null and Void.
- 4) A declaration that a proposal to amend the Constitution must emanate from within the body of the People on the register of Presidential Electors and to define for future referenda what constitutes a valid proposal.
- 5) A Declaration that the Government has acted outside of its Constitutional authority and contrary to Law by requiring in a Referendum that the sovereign People of Ireland shall be required, if it be the case that they do not approve, to formally deliver their veto to the proposed amendment as this acts in contempt of their sovereignty. A rights holder, by not giving their consent to a proposal has the same effect in law as if they had exercised their veto and so the two circumstances can not and do not need to be distinguished.
- 6) A Declaration that the amendment itself is repugnant to the Constitution as it would introduce irrationality on its face into the Constitution and therefore is not a proposal that the sovereign People of Ireland can lawfully be asked to consider for approval.
- 7) A Declaration that the amendment itself, by referring to a law that is yet to be enacted, is repugnant to the Constitution as it would introduce uncertainty into the Constitution and therefore is not a proposal that the sovereign People of Ireland can give their informed consent to and so can not lawfully be asked to consider for approval. Such a statute when enacted or amended would create immunity from being found repugnant to the Constitution. This would usurp the sovereignty of the People of Ireland.
- 8) A Declaration that the Amendment was not consented to by a majority of the sovereign People.

9) A pre-emptive Order that the costs of this case be granted to the Applicant on the basis that this matter is brought in the national interest and not for any personal benefit.

What order are you seeking if successful?

Leave to Petition the High Court challenging the Validity of the Provisional Referendum Certificate of the 34th Amendment to the Constitution (Marriage Equality) Bill 2015 And Articles 46 & 47 of the Constitution.

Order being appealed: set aside vary/substitute

Original order: set aside restore vary/substitute

If a declaration of unconstitutionality is being sought please identify the specific provision(s) of the Act of the Oireachtas which it is claimed is/are repugnant to the Constitution

If a declaration of incompatibility with the European Convention on Human Rights is being sought please identify the specific statutory provision(s) or rule(s) of law which it is claimed is/are incompatible with the Convention

Are you asking the Supreme Court to:

depart from (or distinguish) one of its own decisions? Yes No

If Yes, please give details below:

make a reference to the Court of Justice of the European Union? Yes No

If Yes, please give details below:

Will you request a priority hearing? Yes No

If Yes, please give reasons below:

It is in the public interest that the true outcome of the Referendum be declared without delay.

Signed: _____

(Solicitor for) the applicant/appellant

Please submit your completed form to:

The Office of the Registrar of the Supreme Court

The Four Courts

Inns Quay

Dublin

together with a certified copy of the Order and the Judgement in respect of which it is sought to appeal.

This notice is to be served within seven days after it has been lodged on all parties directly affected by the application for leave to appeal or appeal.