

**By Email**

Peter Thompson  
Chief Executive  
HFEA  
2 Redman Place  
London  
E20 1JQ

26 February 2023

Dear Peter,

**Suspension of Licences for Centre 0015:  
Notice of Exercise of Right**

I am writing on behalf of Centre 0015 to confirm my intention to exercise my right to require the Authority to reconsider its decision to suspend the Centre's licence with immediate effect. No details were given about to whom this notice should be sent so I am sending it to you.

1. Contact Details of Appellant

Dr Aruna Naware  
iTrust Fertility Eastbourne  
6 Park View  
Alder Close  
Eastbourne  
East Sussex  
BN23 6QE

Tel: [REDACTED]

2. Licence Number

0015

3. Representation

I wish to be represented and my representative's details are as follows:

James Lawford Davies  
Hill Dickinson LLP  
The Broadgate Tower  
20 Primrose Street  
London  
EC2A 2EW

Tel: 0207 280 9199

4. Original Decision

I enclose a copy of the original decision.

5. Grounds

The grounds of challenge are as follows:

- The decision to suspend the licence was unlawful;
- The decision was a misuse of statutory power, irrational and unfair;
- The Licence Committee failed to take into account relevant considerations and misapplied other considerations;
- Immediate suspension constitutes a breach of rights under Article 1, Protocol 1 of the European Convention of Human Rights; and
- The decision is contrary to the HFEA's Compliance and Enforcement Policy.

6. Material submitted to the Authority

No material was submitted to the Authority prior to the decision other than the material submitted as a part of the licence renewal process. This is all held by the Authority but if you require a further copy, this can be provided on request.

7. New material

No material was submitted to the Authority prior to the decision.

8. Skeleton Argument

I enclose a copy of our skeleton argument.

9. Witnesses

None.

10. Reconsideration

I would like my representations to be considered at a hearing.

11. Case Management

I do not consider that a case management meeting is necessary.

I should be grateful if you would confirm receipt of this notice. I should also be grateful if you would ensure that a date for the hearing is arranged as a matter of urgency. Every day that passes while the suspension remains in place is extremely damaging.

Yours sincerely,

Dr Aruna Naware