

## **NOTE ON CASE REFERENCES ON "MANIFESTLY WITHOUT REASONABLE FOUNDATION"**

1. The ECtHR decision is *JD and A v United Kingdom* [2020] H.L.R 5, especially at [87] to [89].
2. The recent Court of Appeal case concerned with the approach of an appellate court to proportionality is *R (on the application of) TP, AR, & SXC v SSWP* [2020] EWCA Civ 37, at [120] to [123].
3. In a judgment handed down yesterday (12.5.20) Singh LJ cited [89] of *R(C) v SSWP* [2019] 1 WLR 5687 as part of the "background of principle" to *MWRF* - see [65] of *R(on the application of) TD, AD, and Patricia Reynolds v SSWP*.