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Christian J Howells

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Practice Overview

Christian J Howells specialises in public and constitutional law. He was appointed to the Attorney General's A Panel of Regional Counsel in 2020 and the Welsh Government's A Panel of Counsel in 2021. Since then, an increasing focus of his work has been representing Government in complex and highly significant cases before the higher courts or in public inquiries.

Christian has appeared in important cases in the immigration field, including: (i) an appeal before the Master of the Rolls where the Court was successfully persuaded to hold that the historic injustice caused to Gurkhas by the denial of their settlement rights was a decisive factor in the proportionality balancing exercise when considering their human right to a family life in the UK, thereby changing the law to benefit hundreds of adult dependent children of Gurkhas ([2013] 1 WLR 2546); and (ii) an appeal before the Supreme Court where the Court was successfully persuaded that the Court of Appeal was wrong in its interpretation of legislation codifying human rights considerations in deportation cases, thereby strengthening the rights of the child under those provisions ([2018] 1 WLR 527). He successfully represented the claimant in a complex judicial review of a decision to close 21 libraries by a council in financial trouble ([2018] ACD 123).

Christian has developed a niche practice in environmental law in Wales, having represented the Welsh Government in the Court of Appeal in an environmental permitting appeal and in the High Court in *R (Coal Action Network) v Merthyr Tydfil County Borough Council and the Welsh Ministers* which concerned a challenge to the Welsh Ministers' reserve powers of enforcement in relation to Ffos-y-fran opencast mine. He advised on a change of use application which engaged the Welsh Government's moratorium on new carbon-based power stations. He represented the claimant in an environmental law challenge to the decision to build a new hospital on wild meadows, and successfully obtained an Aarhus cost order on behalf of a single claimant in a representative capacity.

His constitutional law cases include representing the Counsel General for Wales in a Supreme Court reference of the UNCRC Incorporation (Scotland) Bill and a judicial review of the Internal Market Act 2020 challenging the legality of the implied effect on devolved competence. He acted pro bono on behalf of Women's Equality Network Wales in relation to proposed Senedd legislation on election candidate lists introducing a minimum requirement for female representation (his advice was published and submitted to a special purpose Senedd Committee).

He is a leading practitioner in social care law and has appeared in all reported cases under the Social Services and Well-being (Wales) Act 2014, including challenges on behalf of young adults concerning their placements (successfully establishing contempt against a local authority for breaching a mandatory order), the duties to looked-after children, children's continuing healthcare and challenges to the functions of regional safeguarding boards. His health work includes challenges to hospital reorganisation and air ambulance reorganisation.



He is very experienced in complex inquests and inquiries and is currently instructed as leading junior for the families in the inquest into the Gleision mining disaster and represented victims in the Infected Blood Inquiry and the Welsh Ministers in the Covid-19 Public Inquiry.

He is consistently recognised in both the Legal 500 and Chambers and Partners as a leading junior in administrative law, inquests and inquiries. He has extensive experience in the higher courts, including the Administrative Court, Court of Appeal and Supreme Court. He is instructed on behalf of individuals, governments and local authorities.

Due to his inquiry experience, he was recently invited to join a Bar Council Law Reform Committee to respond to the House of Lords Inquiry into Statutory Inquiries. He also sits on the Bar Council Legal Services Committee and the Inner Temple Bar Liaison Committee as the Wales representative.

Notable and Reported cases

- Constitutional law

REFERENCE by the Attorney General and the Advocate General for Scotland – United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill [2021] UKSC 42, [2021] 1 WLR 5106 – Led by Helen Mountfield KC, instructed by the Counsel General for Wales in a devolution reference concerning the way in which the legislation passed by the Scottish Parliament sought to implement the UNCRC so as to render it outside of legislative competence.

R (Counsel General for Wales) v Secretary of State for Business [2022] EWCA Civ 118 - led by Helen Mountfield KC, instructed by the Counsel General for Wales in a judicial review of the UK Internal Market Act 2020 which sought declarations that UKIMA cannot curtail the legislative competence of the Senedd by implication or secondary legislation.

- Health

R (Evans) v all 7 Local Health Boards – led by Joanne Clement KC, represented the claimant in a challenge to the decision of the NHS Joint Commissioning Committee to approve the reorganisation of the Welsh Air Ambulance service. The case concerned allegations of rationality, breach of Gunning consultation principles in a voluntary consultation and PSED.

R (Hari Jones) v Betsi Cadwaladr University Local Health Board and Gwynedd County Borough Council – represented an 8-year-old child in receipt of continuing healthcare in a claim against the health board and council alleging a failure to provide the necessary care and support to allow him to attend school. Case concerned the new duty of quality on health boards, the duty on the health board to provide health services it considered necessary, the duty on local authorities to meet needs for care and support, the duties on both to establish partnership arrangements and to provide additional learning provision.

R (CN) v Secretary of State for Health and Social Care [2022] EWCA Civ 86, [2022] 4 WLR 73 – represented the claimant, a person infected by the NHS with Hepatitis B in the 1980s, who sought to challenge the discriminatory (art 14 ECHR) failure to include persons infected with Hepatitis B in the infected blood support schemes.

R (HE) v Lord Chancellor [2020] EWHC 1411 (Admin) – successfully represented the claimant in a claim concerning the failure to exempt payments made by the infected blood support schemes when applying the financial eligibility criteria to an application for legal aid.

- Social Care



R (TJ) v Monmouthshire County Borough Council [2024] EWHC 2594 (Admin) – successfully represented an 18-year-old care leaver in a case concerning the failure of the local authority to provide suitable accommodation as part of a transition plan with housing services and a failure to take into account the claimant's wishes, feelings and views in relation to accommodation.

R (Pollock) v CYSUR: Mid and West Wales Safeguarding Children Board [2023] EWHC 299 (Admin) – successfully represented the local authority in a challenge to a refusal to disclose a serious case review following the death of a child.

R (JS) v Cardiff County Council [2022] EWHC 707 (Admin) – successfully represented the claimant in a challenge to the local authority's failure to meet educational needs of a young adult with autism. The local authority breached a mandatory order and were found in contempt of court.

R (Patton) v HM Assistant Coroner for Pembrokeshire and Carmarthenshire [2022] EWHC 1377 (Admin), [2022] Inquest LR 215 – successfully represented the Claimant in a challenge to the Coroner's decision at a pre-inquest review that article 2 ECHR was not engaged. The Court held that the Coroner erred in his approach when considering whether the local authority was under a duty to provide suitable accommodation to a 16 year old child pursuant to section 76 of the Social Services and Well-being (Wales) Act 2014.

- Environmental

R (Coal Action Network) v Merthyr Tydfil County Borough Council and the Welsh Minister – successfully represented the Welsh Ministers in a claim concerning the ongoing extraction of coal at the Ffos-y-Fran opencast mine in breach of planning conditions. Case concerned the reserve powers of the Welsh Ministers to take enforcement action.

R (Atlantic Recycling Ltd) v Welsh Ministers – successfully represented the Welsh Ministers in a claim relating to a statutory appeal against enforcement action under the environmental permitting regime.

R (Lewis) v Welsh Ministers [2022] EWHC 450 (Admin) – Instructed by the claimant in a claim against the Welsh Ministers' decision to fund the redevelopment of the Velindre Cancer Centre on the site known as the Northern Meadows. Successfully applied for an Aarhus cost capping order on behalf of an individual claimant who was part of a campaign group in circumstances where the claim was crowd funded.

- Immigration

Butt v Secretary of State for the Home Department [2025] EWCA Civ 189 – successfully represented the Secretary of State in an appeal concerning the application of Chikwamba and EB (Kosovo) to article 8 ECHR appeals under the Immigration Rules and s117B of the Nationality, Immigration and Asylum Act 2002.

R (Branco-Bonfim) v Secretary of State for the Home Department [2024] EWCA Civ 1421, [2025] 1 WLR 1049 – represented the Secretary of State in an appeal concerning the appeal rights of persons subject to deportation orders under the European Economic Area (Immigration) Regulations 2016 where that deportation order was certified and the person subsequently re-entered the UK unlawfully and made a human rights claim.

IT (Jamaica) v Secretary of State for the Home Department [2018] UKSC 53, [2018] 1 WLR 5273 - Led by Richard Drabble KC, represented the appellant in an appeal concerning the codification of article 8 ECHR considerations in deportation cases in s117C of the Nationality, Immigration and Asylum Act 2002. This appeal also concerned article 3 UNCRC.

R (Gurung) v SSHD [2013] 1 WLR 2546 – successfully argued that the historic injustice caused to Gurkha



veterans was an important factor in the article 8 ECHR proportionality balancing exercise.

- Local Government

R (Williams) v Caerphilly County Council [2020] EWCA Civ 296, [2020] PTSR 1130 - Led by Philip Havers KC, represented the appellant in an appeal regarding; (i) whether the local authority had to comply with the Welsh improvement duty contained in the Local Government (Wales) Measure 2009; and (ii) whether the cabinet could adopt a leisure strategy which was not foreshadowed in a budget.

R (DJ) v Welsh Ministers [2019] EWCA Civ 1349, [2020] PTSR 466 - Led by Ruth Henke KC, represented the appellant in a challenge to the Welsh Ministers' policy for the funding of education for young adults with learning difficulties at specialist residential colleges. It was argued that the policy amounted to an unlawful fetter on the discretion to fund such provision under s32 of the Learning and Skills Act 2000.

R (WX) v Northamptonshire County Council [2018] EWHC 2178 (Admin) – successfully represented the claimant in a challenge to the closure of 21 libraries arguing a failure to consider results of consultation, irrationality, library duty, PSED.

R (Tilley) v Vale of Glamorgan Council [2016] EWHC 2272 (Admin) – represented the claimant in a challenge to the decision to implement community libraries arguing irrationality, PSED, comprehensive and efficient library service duty, best interests of child.

R (Tilley) v Vale of Glamorgan Council [2015] EWHC 3194 (Admin) – represented the claimant in a challenge to a decision to implement community-led libraries arguing unfair consultation, PSED and library duty.

- Inquests and Inquiries

Gleision Mining Disaster Inquests – represents 3 families in the inquest into the deaths of four miners who drowned following an inrush of groundwater at the Gleision Colliery in 2013. Successfully submitted that the inquests should be re-opened over a decade later, following acquittals of the mine owner and manager for gross negligent manslaughter, as article 2 ECHR was engaged based on arguable failures of the HSE and Coal Authority to regulate mining activity.

Sky Lewis inquest – represents the family of a teenage child who took her own life following an out-of-area placement for mental health therapy when as a result of the failure of multi-agency co-operation she did not receive any therapy from CAMHS following her placement and before her death. Article 2 ECHR engaged.

Kianna Patton inquest – represents the family of a teenager who took her own life in circumstances where the local authority arguably failed to identify her as a looked-after child and provide her with accommodation and an arguable failure of multi-agency co-operation between CAMHS and the local authority. Article 2 ECHR engaged.

Andrew Gwynne inquest – article 2 ECHR inquest into the death of a man who died in an accident on the M4 following a prolonged police chase. The jury found failures by the police to properly plan the pursuit.

Covid-19 Public Inquiry – represented the Welsh Ministers in modules 2 and 2B of the Inquiry concerning the decisions by the UK and Welsh Governments regarding non-pharmaceutical interventions, and in particular the decision to lockdown during the pandemic.

Infected Blood Inquiry – represented hundreds of victims in the Inquiry into the infection of NHS patients with HIV, Hepatitis C and other infections through blood and blood products supplied by the NHS through



the 1970s, 1980s and 1990s.

Inquest into the death of Emiliano Sala – Led by Cathryn McGahey KC, instructed by Cardiff City Football Club in the inquest into the death of footballer Emiliano Sala who died when the plane in which he was travelling crashed into the English Channel.

Administrative Law

His administrative law practice includes the constitution, discrimination, the environment, local government, health, social care, education, immigration and planning. He is at the forefront of devolution issues. He is instructed by governments to advise on achievement of environmental and climate change policy and has represented the Counsel General for Wales in some of the most significant recent constitutional law cases. He is instructed by local authorities to advise on the development of policy in social care. He has an extensive claimant practice in the areas of local government, education (school closures and vulnerable child education), health and discrimination. He was at the forefront of the litigation concerning the settlement of Gurkhas' families. He is instructed in a number of claims arising out of the support schemes established to make payments to persons infected and affected by infection with Hepatitis B and C, HIV and vCJD by the NHS through blood and blood products.

Notable & Reported Cases

- **REFERENCE** by the Attorney General and the Advocate General for Scotland – United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill [2021] UKSC 42 – Led by Helen Mountfield QC, instructed by the Counsel General for Wales in a devolution reference concerning the way in which the legislation passed by the Scottish Parliament sought to implement the UNCRC so as to render it outside of legislative competence.
- **R (CN) v Secretary of State for Health and Social Care** (permission to appeal against a refusal of permission by Stacey J granted) – Instructed by a claimant infected with Hepatitis B in the 1980s who seeks to challenge the discriminatory (art 14 ECHR) failure to include persons infected with Hepatitis B in the infected blood support schemes, established to make financial payments to persons infected with Hepatitis C and HIV through NHS blood and blood products in the 1970s, 1980s and 1990s.
- **R (Atlantic Recycling Ltd) v Welsh Ministers** – Instructed by the Welsh Ministers, he successfully resisted a claim for judicial review and an application for permission to an appeal in relation to a statutory appeal against enforcement action under the environmental permitting regime.
- **R (Ellis) v Welsh Ministers** – Instructed by the claimant in a claim against the changes to the Wales Infected Blood Support Scheme, designed to contribute towards parity of support across the UK, on the basis that the failure to include means-tested payments for child dependants of those infected with HCV and/or HIV by the NHS through blood and blood products was irrational and/or discriminatory (article 14 ECHR).
- **R (Lewis) v Welsh Ministers** – Instructed by the claimant in a claim against the Welsh Ministers' decision to fund the redevelopment of the Velindre Cancer Centre on the site known as the Northern Meadows.
- **R (Counsel General for Wales) v Secretary of State for Business** - led by Helen Mountfield QC, he acts on behalf of the Counsel General in a judicial review of the UK Internal Market Act 2020 which seeks declarations that UKIMA cannot curtail the legislative competence of the Senedd by implication or secondary legislation. This is a most significant constitutional case affecting Wales.
- **R (HE) v Lord Chancellor** [2020] EWHC 1411 (Admin) (permission) – He was instructed on behalf of the claimant in a challenge to the Civil Legal Aid (Financial Resources) Regulations 2013 on the basis that although they disregarded support payments made to victims of the Grenfell Tower fire and Windrush scandal in the capital means test, they did not disregard support payments made to victims of the infected blood disaster; such treatment was discriminatory within the meaning of article 14 ECHR read with article 8 ECHR and A1P1. Following a successful settlement, the Lord Chancellor introduced amendment regulations to create a disregard.



- *R (Williams) v Caerphilly County Council* [2020] EWCA Civ 296 - Led by Philip Havers QC he acted on behalf of the appellant in an appeal regarding; (i) whether the local authority had to comply with the Welsh improvement duty contained in the Local Government (Wales) Measure 2009; and (ii) whether the cabinet could adopt a leisure strategy which was not foreshadowed in a budget.
- *R (DJ) v Welsh Ministers* [2019] EWCA Civ 1349, [2020] PTSR 466 - Led by Ruth Henke QC he acted on behalf of the appellant in a challenge to the Welsh Ministers' policy for the funding of education for young adults with learning difficulties at specialist residential colleges. It was argued that the policy amounted to an unlawful fetter on the discretion to fund such provision under s32 of the Learning and Skills Act 2000.
- *R (DJ) v Welsh Ministers* [2018] EWHC 2735 (Admin) – JR challenging the lawfulness of the policy on funding further education for young people with learning difficulties arguing unlawful fetter;
- *R (WX) v Northamptonshire County Council* [2018] EWHC 2178 (Admin) – successful challenge to closure of 21 libraries arguing a failure to consider results of consultation, irrationality, library duty, PSED;
- Contaminated blood scandal - Advised and drafted a letter before claim on behalf of victims and their families against the UK Government's refusal to hold a public inquiry into the contaminated blood scandal arguing article 2 ECHR;
- *R (PL) v Cardiff City Council* - Successful claim against the Council's refusal to make direct payments under the Social Services and Well-being (Wales) Act 2014 on the basis that the Claimant could not manage the payments;
- *R (KW) v HM Deputy Coroner for Pembrokeshire* – JR against refusal to hold an article 2 ECHR compliant inquest;
- *R (Tilley) v Vale of Glamorgan Council* [2016] EWHC 2272 (Admin) – JR against a decision to implement community libraries arguing irrationality, PSED, comprehensive and efficient library service duty, best interests of child;
- *R (Tilley) v Vale of Glamorgan Council* [2015] EWHC 3194 (Admin) – JR against a challenge to a decision to implement community-led libraries arguing unfair consultation, PSED and library duty.

Inquests and Inquiries

Christian is instructed on behalf of over 300 victims from Wales and Northern Ireland in the Infected Blood Inquiry which will look into the circumstances surrounding the contaminated blood scandal of the 1970s and 1980s and the allegation of a cover-up.

He is also instructed by the mother of a 13 year old boy who died in school grounds. It is argued that social services failed to make a referral to Specialist Child and Adolescent Mental Health Services and that there was a systemic failure of information sharing between the two agencies.

He was also instructed on behalf of the family of a man who died as result of a counter-intuitive metro system on the Swansea Kingsway.

He is instructed on behalf of families, the NHS, the MOD and the MOJ.

Reported Cases

- Inquest into the death of Emiliano Sala – Led by Lloyd Williams QC, he is instructed on behalf of Cardiff City Football Club in the inquest into the death of footballer Emiliano Sala. Mr Sala died when the plane in which he was travelling crash into the English Channel. The Air Accidents Investigation Branch published its investigation report on 13 March 2020 which found, amongst other things, that the pilot was not licensed to fly the plane. It concluded that Mr Sala was unconscious through carbon monoxide poisoning by the time of the crash, but that immediately before hitting the water the pilot was conscious and using the plane's controls. The inquest has been listed during March 2021



- Inquest into the death of Luke Jones - he acted upon behalf of HMP Berwyn concerning the super prison's first suicide related death.
- Inquest into the death of Lewys Crawford - he acted on behalf of Cardiff & Vale University Local Health Board in the inquest into the death of three month old child from sepsis.
- Inquest into the death of Annette Hewings - he acted on behalf of the family in an inquest into the death of a woman who was detained in hospital under the Mental Health Act and forced to go through opiate withdrawal and who died of a cardiac arrhythmia.

Immigration

Christian has been involved in a number of important appeals relating to article 8 ECHR, best interests of the child and was at the forefront of the Gurkha children settlement litigation.

He is also regularly instructed on behalf of the Government in unlawful detention claims and immigration judicial reviews.

Reported Cases

- *IT (Jamaica) v Secretary of State for the Home Department* [2018] UKSC 53, [2018] 1 WLR 5273 - He appeared in the Supreme Court and overturned the Court of Appeal's reasoning relating to the best interests of the child and deportation under s117C(5) of the Nationality, Immigration and Asylum Act 2002;
- *Gurung v SSHD* [2016] EWCA Civ 358 – argued it was unfair for the Tribunal to assess an article 8 ECHR claim by reference to the facts as at the date of a second decision to refuse entry clearance, in circumstances where the first decision was set aside as unlawful and the delay in the interim had served to weaken the article 8 claim;
- *R (Gurung) v SSHD* [2013] 1 WLR 2546 – successfully argued that the historic injustice caused to Gurkha veterans was an important factor in the article 8 ECHR proportionality balancing exercise;
- *KR (Nepal) v SSHD* – successfully argued that it was procedurally unfair for the UT to change a decision in the written determination after it announced the appeal would be allowed at the end of the hearing;
- *UG (Nepal) v SSHD* [2012] EWCA Civ 48 - argued that the policy for settlement of the adult children of Gurkha veterans created a presumption that leave would be granted;
- *AR (Nepal) v SSHD* [2011] EWCA Civ 1439 – successfully argued that the appellant could rely upon post-decision evidence that he now satisfied the 10 year long residence rule.

Community Care

Christian is regularly instructed on behalf of claimants, local authorities and NHS LHBs. He has advised on the legality of local authorities' charging policies and funding disputes between NHS LHBs and Trusts in relation to continuing healthcare. He is instructed in challenges to care plans and has a particular expertise in relation to young adults with a diagnosis of ASD.

- *R (DJ) v Welsh Ministers* [2019] EWCA Civ 1349, [2020] PTSR 466 - Led by Ruth Henke QC he acted on behalf of the appellant in a challenge to the Welsh Ministers' policy for the funding of education for young adults with learning difficulties at specialist residential colleges. It was argued that the policy amounted to an unlawful fetter on the discretion to fund such provision under s32 of the Learning and Skills Act 2000.

Local Government and Planning



Christian has a particular expertise in relation to local government strategic and funding decisions relating to public services, such as libraries and leisure centres. He is instructed by the Welsh Government and local authorities in relation to statutory appeals, reviews and judicial reviews of planning and environmental enforcement.

Appointments

- Attorney General's Regional Civil Panel of Counsel – A panel.
- Counsel General for Wales's Panel of Counsel – A panel.

Memberships

- Administrative Law Bar Association, Public Law Wales

Recommendations

- "Christian is a very diligent and user-friendly barrister." "Christian is a very strong performer in court."
"Christian Howells is a persuasive advocate." "He has top level advocacy. He is incredibly persuasive and very calm on his feet. He is able to deal with the detail." (Chambers & Partners 2025 - Administrative & Public Law)
- "Christian is our go-to barrister for public law matters and inquiries. He's a very safe pair of hands."
"Christian is a very strong junior who is able to see beyond the status quo." (Chambers & Partners 2025 - Inquests & Public Inquiries)
- 'Christian is highly proficient, technically excellent and diligent. He is personable, approachable and very user friendly.' (Legal 500, 2025 - Administrative law and human rights)
- Tier 1 (Legal 500, 2025 - Inquests & Inquiries)
- Christian Howells is a panel member for both the UK and Welsh governments, providing a busy practice acting for and advising government departments, local authorities and health boards in complex public law matters. He has further expertise representing claimants in a range of policy challenges. "He has a forensic attention to detail coupled with very strong interpersonal skills." (Chambers & Partners 2024, Administrative & Public Law)
- Christian Howells appears in high-profile public inquiries and Article 2 inquests involving the NHS, prisons and other public services. He acts for both bereaved families and state agents, and has been instructed to represent the Welsh Government in the UK COVID-19 Inquiry. "Christian is a clever, empathetic and tactically astute lawyer." "He is thorough and has a depth of knowledge." (Chambers & Partners 2024, Inquests & Public Inquiries)
- His advice is clear, pragmatic and commercially sensitive. He is an excellent advocate.' (Legal 500, 2024 - Inquests & Inquiries)
- "A leading junior in administrative law, particularly in those cases with a Welsh devolution angle, with a forensic attention to detail coupled with very strong interpersonal skills." (Legal 500, 2024 - Administrative & Public Law)



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- "He is very bright and always up for a challenge. He's fearless." "His advocacy is patient and robust against aggressive opponents, and he argues novel points in relation to Welsh government obligations." (Chambers UK, 2023 - Administrative & Public Law)
 - "Christian is an experienced junior, who is very bright and always up for a challenge. He works hard and he is fearless." (Chambers UK, 2023 - Inquests & Public Inquiries)
 - Tier 1 (Legal 500, 2023 - Inquests & Inquiries)
 - "Christian is an efficient and intellectually astute barrister. He is extremely organised and thorough in his preparation." (Legal 500, 2023 - Administrative & Public Law)
 - "He is a helpful barrister who provides clear answers." "His work ethic and insight are really impressive." (Chambers UK, 2022 - Inquests & Public Inquiries)
 - "A succinct and very good advocate who demonstrates a good understanding of the nuances of legislation." "He's on the ball and gets to grips with everything very quickly." (Chambers UK, 2022 - Administrative & Public Law)
 - 'Mr Howells is very bright. He assimilates information quickly – always up for a fight and very accessible.' (Legal 500, 2022 - Inquests & Inquiries)
 - 'Christians knowledge and experience of local authority law, Welsh devolved law, human rights law and judicial review is excellent.' (Legal 500, 2022 - Administrative & Public Law)
 - "He's extremely bright and extremely hard-working." (Chambers UK 2021)
 - 'A tenacious advocate with a very sharp intellect.' (Legal 500 2021 - Administrative and Public Law & Inquests and Inquiries)
 - 'His practice includes representation of families at inquests as well as authority work.' (Legal 500, 2020 - Inquests and Inquiries)
 - 'Acts for all parties in judicial review cases.' (Legal 500, 2020 - Public Law)
 - 'A tenacious advocate with a very sharp intellect.' (Legal 500, 2019)

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