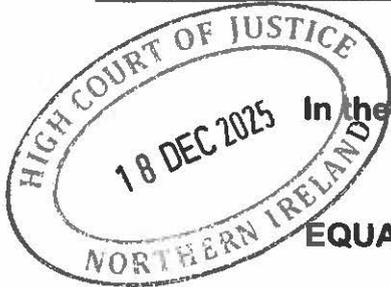


**IN THE HIGH COURT OF JUSTICE IN NORTHERN IRELAND**  
**KING'S BENCH DIVISION (JUDICIAL REVIEW)**



**In the Matter of an Application for Leave to Apply for  
Judicial Review by:**

**EQUALITY COMMISSION FOR NORTHERN IRELAND**

**And in the matter of the application of the judgment of the Supreme Court in  
*For Women Scotland Ltd v The Scottish Ministers* in Northern Ireland**

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**AFFIDAVIT OF GERALDINE MCGAHEY, ON BEHALF OF THE EQUALITY  
COMMISSION FOR NORTHERN IRELAND**

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I, Geraldine McGahey, Chief Commissioner of the Equality Commission for Northern Ireland, aged 18 years and upwards, make oath and say as follows:

1. This is the second affidavit I have made in this application, and it is provided to address an omission in the first affidavit dated 2 December 2025.
2. In paragraph 20 of the first affidavit, I averred that the Equality Commission had received 22 responses to the pre-action protocol letters that we had sent. It has subsequently come to light that we received 23 responses. There is a need, therefore, to make consequential changes to the bundle of documents that are exhibited with the application. This has been done by adding the 23<sup>rd</sup> response letter, that from the Police Service of Northern Ireland, to the exhibits marked 'GMcG 1' at pages 343.1-343.2. and the list of Respondents at page 221 has been amended accordingly with the amendment highlighted in red.
3. Save as otherwise appears I depose the foregoing from my own personal knowledge and belief.

A handwritten signature in black ink, appearing to read "Geraldine McGahey".

SWORN at ... Lewis Silken (NI) LLP  
in the City of Belfast  
this 18<sup>th</sup> day of December 2025  
before me, a solicitor  
empowered to administer oaths

A handwritten signature in black ink, appearing to read "Ciara Fuller".

This affidavit is filed on behalf of the Applicant by their Solicitor, Eoin O'Neill, of the Equality Commission for Northern Ireland of Equality House, 7-9 Shaftesbury Square, Belfast, BT2 7DP.