

COURT FILE NUMBER KBG-RG-01978-2023

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE OF REGINA

APPLICANTS: **UR PRIDE CENTRE FOR SEXUALITY AND GENDER DIVERSITY**

RESPONDENT: **GOVERNMENT OF SASKATCHEWAN AS REPRESENTED BY THE MINISTER OF EDUCATION, CONSEIL DES ÉCOLES FRANSASKOISES, CHINOOK SCHOOL DIVISION, CHRIST THE TEACHER CATHOLIC SCHOOL, CREIGHTON SCHOOL DIVISION NO. 111, GOOD SPIRIT SCHOOL DIVISION, GREATER SASKATOON CATHOLIC SCHOOLS, HOLY FAMILY ROMAN CATHOLICS SEPARATE SCHOOL DIVISION #140, HOLY TRINITY CATHOLIC SCHOOLS, HORIZON SCHOOL DIVISION, ILE-A-LA CROSSE SCHOOL DIVISION NO. 112, LIGHT OF CHRIST CATHOLIC SCHOOLS, LIVING SKY SCHOOL DIVISION NO. 202, LLOYDMINSTER CATHOLIC SCHOOL DIVISION, LLOYDMINSTER PUBLIC SCHOOL DIVISION, NORTH EAST SCHOOL DIVISION, NORTHERN LIGHTS SCHOOL DIVISION NO. 113, NORTHWEST SCHOOL DIVISION #203, PRAIRIE SOUTH SCHOOL DIVISION, PRAIRIE SPIRIT SCHOOL DIVISION, PRAIRIE VALLEY SCHOOL DIVISION, PRINCE ALBERT CATHOLIC SCHOOL DIVISION, REGINA CATHOLIC SCHOOLS, REGINA PUBLIC SCHOOLS, SASKATCHEWAN RIVERS SCHOOL DIVISION, SASKATOON PUBLIC SCHOOL, SOUTH EAST CORNERSTONE PUBLIC SCHOOL DIVISION #209, AND SUN WEST SCHOOL DIVISION**

**ORIGINATING APPLICATION**

## NOTICE TO THE RESPONDENTS

This application is made against you. You are a respondent.

You have the right to state your side of this matter before the Court. To do so, you must be in Court when the application is heard as shown below:

Where Court of King's Bench for Saskatchewan

2425 Victoria Avenue

Regina, SK S4P 4W6

Date Thursday, September 14, 2023

Time 10:00 am

Go to the end of this document to see what you can do and when you must do it.

## PARTICULARS OF APPLICATION

### The Applicant seeks the following remedy or order:

1. The applicant, UR Pride Centre for Sexuality and Gender Diversity (“**UR Pride**”), makes this Application for:

- (a) a declaration that the Saskatchewan Ministry of Education’s policy entitled “Use of Preferred First Name and Pronouns by Students”, effective August 22, 2023 (the “**Policy**”) limits the right not to be deprived of security of the person except in accordance with the principles of fundamental justice (as guaranteed in section 7 of the *Canadian Charter of Rights and Freedoms* (the “**Charter**”)) and the right to equality (guaranteed in section 15(1) of the *Charter*), and that neither limit is reasonable and demonstrably justifiable (as required under section 1 of the *Charter*);
- (b) declarations under s. 52(1) of the *Constitution Act, 1982* that:
  - (i) to the extent the Policy requires school personnel to request parental/guardian consent when a student under the age of 16 “requests that their preferred name, gender identity, and/or gender expression be used”, this “**Outing Requirement**” is of no force and effect; and

- (ii) to the extent the Policy requires school personnel not to use the “preferred name, gender identity, and/or gender expression” of a student under the age of 16 absent consent from the student’s parent(s) or guardian(s), this “**Misgendering Requirement**” is of no force and effect;
- (c) interim and interlocutory orders, under section 24(1) of the *Charter* or otherwise, enjoining the Respondent School Divisions (defined below) from implementing and enforcing the Policy until this Application has been finally adjudicated;
- (d) public interest standing to bring this Application;
- (e) costs of this Application plus applicable taxes; and
- (f) such further and other relief as this Court considers just.

**The Applicant’s grounds for making this Application are:**

**A. Overview**

2. On August 22, 2023, the Government of Saskatchewan introduced what it described as “new parental inclusion and consent policies for Saskatchewan schools”. These “policies” are set out in a document entitled *Use of Preferred First Name and Pronouns by Students* (the “**Policy**”). The Policy became effective on August 22, 2023 — the day it was published.

3. The Policy requires each of the 27 Saskatchewan school districts to develop and publish administrative procedures for the implementation of the Policy. Appended to the Policy as Appendix A is a “Sample Administrative Procedure”. The sample procedure is part of the Policy, which the Policy document describes as “a guide” for school divisions to use in complying with the Policy.

4. The Policy requires all 27 Saskatchewan school districts to obtain or request consent to use a student's "preferred"<sup>1</sup> first name and pronouns when that change is made to align with their gender identity. Students aged 16 or over may provide their own consent.

5. For students under the age of 16, however, the Policy creates two specific requirements: the Outing Requirement and the Misgendering Requirement.

6. The Outing Requirement requires school personnel to seek parental/guardian consent when a student under the age of 16 "requests that their preferred name, gender identity, and/or gender expression be used". To comply with this requirement by seeking parental/guardian consent, school personnel presumably must notify the student's parent(s) or guardian(s) of the student's preferences concerning their "name, gender identity, and/or gender expression". If the student has not already disclosed their preferences to their parent(s) or guardian(s) — *e.g.*, because the student does not feel safe doing so — the Policy apparently requires school personnel to "out" them, despite any risk to the student.

7. Absent parental/guardian consent for a student under the age of 16, the Policy imposes the Misgendering Requirement.<sup>2</sup> Since the Policy only permits school personnel to refer to students under the age of 16 by their "preferred name, gender identity, and/or gender expression" if the student's parent(s) or guardian(s) provide(s) their consent, the Policy conversely requires school personnel to deadname and misgender students under the age of 16 in the absence of parental/guardian consent.

8. The Misgendering Requirement is sweeping. If a student under the age of 16 comes out as transgender, non-binary or gender diverse (together "**gender diverse**") to one trusted teacher, and asks that teacher to refer to them in accordance with their gender identity but only in private conversations, the teacher must still refuse to do so. Even if the student requires adult

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<sup>1</sup> This Originating Application uses the qualifier "preferred" before "name" and "pronouns" because this is the language used in the Policy. However, "preferred" is misleading here: one's chosen name and pronouns are not a matter of preference but rather are directly connected to one's intrinsic identity.

<sup>2</sup> "Misgendering" is the practice of referring to an individual by pronouns or other gender markers that do not accord with their gender identity. "Deadnaming", by contrast, is the practice of referring to an individual by a name that does not accord with their gender identity. The Misgendering Requirement requires school personnel not only to misgender transgender and gender non-binary students under the age of 16 in the absence of parental/guardian consent, but also to deadname them.

support in understanding their gender identity — so that they can become ready to come out to their parents and others, among other things — the teacher must insist on misgendering and deadnaming the student in the absence of parental/guardian consent. As the Policy states in section 8.3 of the sample procedures in Appendix A, “[t]he student should be made aware that until authorization is in place, their preferred name and pronouns will not be changed”.

9. For gender diverse students under the age of 16 who do not feel safe coming out to their parent(s) or guardian(s), or who simply are not yet ready to do so, the Policy presents an impossible choice: be outed at home or be misgendered at school, even in one-on-one counselling sessions with school personnel. Either outcome entails devastating and irreparable harm to a vulnerable young person.

10. The Policy thus denies gender diverse students what should be a basic entitlement in a free and democratic society: a safe and welcoming educational environment in which to be themselves. Under the Policy, if gender diverse students under the age of 16 cannot safely come out at home, or if their parent(s) or guardian(s) refuse to provide consent, they have no recourse at all.

11. The Policy represents a dramatic and regressive change from existing practices in Saskatchewan school districts. Until August 22, 2023, there was no mandatory policy that required school personnel to seek parental/guardian consent before using a student’s preferred name or pronouns in the learning environment. Teachers and school personnel were able to use — and did use in practice — their professional judgment to adopt the best course of action in the circumstances.

12. This meant providing students with a safe environment in which to explore or question their gender identity. A student could discuss their gender identity with a teacher, and even “come out” to a teacher, without the risk of being outed to others. Such a student could have open, honest, and respectful counselling conversations in which school personnel recognized and respected their gender identity, even as the student gained the confidence necessary to share this important part of themselves with their parents and others. Teachers and other school personnel thus could, and did, play an invaluable role in helping students feel safe. Students were able to “come out” on their own terms and timeline, including to the student’s parents.

13. The Policy puts an end to this, deliberately and by design. In doing so, it represents a significant and dangerous deviation from the existing practices across Saskatchewan school districts. Gender diverse students under the age of 16 will suffer significant and irreparable harm as a consequence.

14. The Outing Requirement and the Misgendering Requirement each violate the *Charter* rights of gender diverse students under the age of 16. Specifically, these requirements of the Policy impose limits on the rights under sections 7 and 15(1) of the *Charter* of gender diverse students under the age of 16, and these limits cannot be justified under section 1 of the *Charter*. To prevent irreparable harm, the Court should exercise its authority, including its remedial authority under section 24(1) of the *Charter*, immediately to enjoin the implementation of these requirements of the Policy.

15. Since the Outing Requirement and the Misgendering Requirement constitute law that is not consistent with the provisions of the Constitution, and since the Policy cannot stand without these unlawful requirements, the entire Policy should be declared of no force and effect under section 52(1) of the *Constitution Act, 1982*. The Applicant seeks an order striking down the Policy in its entirety.

## **B. The Applicant**

16. UR Pride is a non-profit 2SLGBTQI+<sup>3</sup> service provider housed at the University of Regina. UR Pride provides services and programming for the entire community of Regina.

17. Initially founded in 1996 as a student club, UR Pride was incorporated as a non-profit agency in 2005. UR Pride's mandate is:

- (a) to provide and promote health, wellness, and social support for sexually and gender diverse people on campus and throughout the City of Regina;

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<sup>3</sup> This acronym refers to Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and other ("+") identities.

- (b) to promote an intergenerational community of sexually and gender diverse people on campus and throughout the City of Regina;
- (c) to advocate for the safety and equitable inclusion of sexually and gender diverse people on campus and throughout the City of Regina; and
- (d) to provide avenues for sexually and gender diverse students to expand their skills and explore new leadership opportunities.

18. UR Pride works extensively with gender diverse youth. UR Pride supports 2SLGBTQI+ youth in Saskatchewan by providing vital services such as social support groups, leadership and advocacy skill-building camps, and province-wide support for Gay Straight Alliance initiatives. In addition to supporting gender diverse youth through various programming, UR Pride has a long history of policy work. UR Pride is directly responsible for bringing in gender-neutral washrooms across the University of Regina. UR Pride has also worked on an initiative for the Saskatchewan Health Authority that would help transgender people access health care in Saskatchewan.

### **C. The Respondents**

19. The Minister of Education is the Crown officer responsible for all matters relating to elementary and secondary education in the Province of Saskatchewan. Pursuant to the *Education Act, 1995*, the Minister of Education may give a written directive to Saskatchewan's 27 school divisions to take any action that the Minister considers necessary in relation to the operations of the school divisions.

20. The respondent school divisions (collectively, the “**Respondent School Divisions**”) comprise the 27 school divisions within Saskatchewan. They are: Conseil des écoles fransaskoises; Chinook School Division; Christ the Teacher Catholic Schools; Creighton School Division No. 111; Good Spirit School Division; Greater Saskatoon Catholic Schools; Holy Family Roman Catholics Separate School Division #140; Holy Trinity Catholic Schools; Horizon School Division; Ile-a-la-Crosse School Division No. 112; Light of Christ Catholic Schools; Living Sky School Division No. 202; Lloydminster Catholic School Division; Lloydminster Public School Division; North East School Division; Northern Lights School

Division No. 113; Northwest School Division #203; Prairie South School Division; Prairie Spirit School Division; Prairie Valley School Division; Prince Albert Catholic School Division; Regina Catholic Schools; Regina Public School; Saskatchewan Rivers School Division; Saskatoon Public Schools; South East Cornerstone Public School Division #209; and Sun West School Division.

**D. Standing**

21. UR Pride should be granted public interest standing to bring this Application. UR Pride meets the criteria for public interest standing:

- (a) *The case raises a serious justiciable issue:* As described below, the Application raises a serious justiciable issue about whether the Government of Saskatchewan has implemented an unconstitutional policy that violates sections 7 and 15(1) of the *Charter*. This is an important and substantial issue that should be decided on the merits.
- (b) *UR Pride has a genuine interest in the matter:* As a leading 2SLGBTQI+ service provider in Saskatchewan, UR Pride provides services and programming for the entire community of Regina. UR Pride supports 2SLGBTQI+ youth in Saskatchewan by providing vital services such as social support groups, leadership and advocacy skill-building camps, and province-wide support for Gay Straight Alliance initiatives. In addition to supporting transgender and gender non-conforming youth through various programming, UR Pride has a long history of policy work relating to gender diverse individuals. This includes its work bringing in gender-neutral washrooms across the University of Regina and its work on an initiative for the Saskatchewan Health Authority that would help transgender people access health care in Saskatchewan. UR Pride is uniquely positioned to represent the interest of gender diverse students in this Application.
- (c) *The proposed suit is a reasonable and effective means of bringing the case to court:* UR Pride has the resources, expertise, and capacity to bring this

Application. It does so with the support of Egale Canada, the leading national 2SLGBTQI+ advocacy organization. UR Pride has engaged *pro bono* litigation counsel at a large national law firm with experience in *Charter* litigation and litigation concerning the rights of 2SLGBTQI+ people specifically. The case is also of public importance, as it will affect the rights of gender diverse students under the age of 16 in the Province of Saskatchewan. There are no realistic alternative means of bringing the within Application, as it would be impracticable — if not impossible — for a gender diverse student under the age of 16 who does not wish to be outed to their parent(s) or guardian(s) or alternatively to be deadnamed at school to bring this Application. Finally, there is no potential impact of this Application on the rights of others, apart from the gender diverse students under the age of 16 whom the Policy affects.

#### **E. The Policy**

22. On August 22, 2023, Saskatchewan’s Minister of Education announced a “new policy” for Saskatchewan schools on the use of preferred names and pronouns to align with gender identity. The Policy was enacted pursuant to the Minister’s authority under section 4.02 of the *Education Act, 1995*. In an undated letter from the Minister to the Respondent School Divisions posted on the Saskatchewan government website on August 22, 2023, the Minister stated that the “new policy” is “effective today” and that it “will require parental consent when students under 16 years old wish to change their pronouns and/or preferred first name”.

23. The Policy states that it is “intended to support students who wish to change their pronouns and/or preferred first name to align with their gender identity”. All of the Respondent School Divisions are required to develop and publish administrative procedures for the implementation of the Policy.

24. For students under the age of 16, the Policy requires school personnel to request parental/guardian consent “[w]hen a student requests that their preferred name, gender identity, and/or gender expression be used”. This is the Outing Requirement, defined and discussed above. The Policy further requires that such consent be obtained before the student’s preferred

name and pronouns may be used in the school environment. This is the Misgendering Requirement, defined and discussed above.

25. For students 16 and older, parental consent is not required. Once the requisite consent has been obtained, the student's preferred first name and pronouns are to be used consistently in ways that the student has requested.

26. The Outing Requirement is illustrated by the "Sample Administrative Procedure" contained in Appendix A to the Policy. Section 5 of the sample procedure states that, "[w]hen a student requests that their preferred name, gender identity, and/or gender expression be used ... if the student is under the age of 16, school personnel **will request parental/guardian consent**" (emphasis added). In other words, disclosure of the student's request (and thus their gender identity) to parent(s) or guardian(s) becomes mandatory as soon as the student requests the use of their preferred name or pronoun(s); school personnel must out the student in order to "request parental/guardian consent" as they are required to do.

27. The brutality of the Misgendering Requirement, meanwhile, is illustrated by the Policy's reference to situations where it is "reasonably expected that gaining parental consent could result in physical, mental, or emotional harm to the student". In such circumstances, the Policy requires the student to be "directed to the appropriate school professional(s) for support. These school professionals are then directed to work with the student "to develop a plan to speak with their parents when they are ready to do so" — all while insistently, and harmfully, misgendering and deadnaming the student.

28. The Misgendering Requirement affords no exception to the requirement of parental/guardian consent. If a student is not "ready" to "speak with their parents" — including in circumstances when "gaining parental consent could result in physical, mental or emotional harm to the student" — the Policy requires that school personnel ignore the student's request that their preferred first name and pronoun(s) be used, even in private counselling conversations the goal of which is to facilitate the student's coming out at home. The Policy instead requires that these students be misgendered and deadnamed by school personnel in the school environment until they turn 16 and can provide consent themselves.

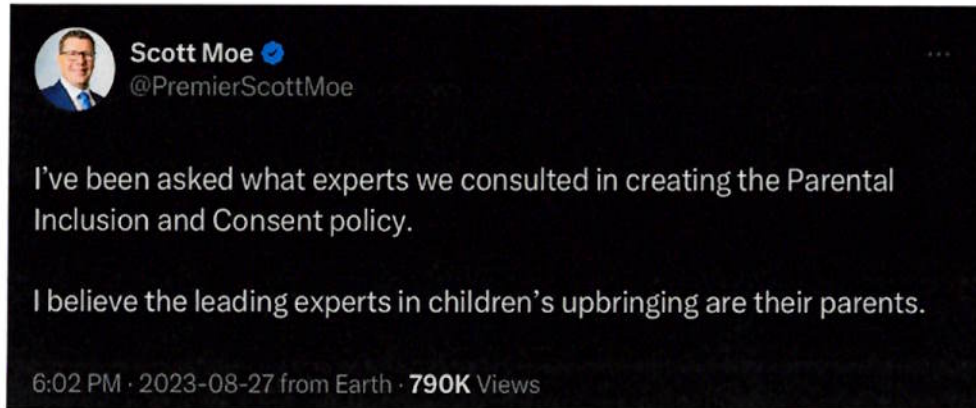
29. The Policy is vague at best with respect to the overlap of the Outing Requirement and the Misgendering Requirement. Though it contemplates “develop[ing] a plan to speak with [the student’s] parents when they are ready to do so”, it also contemplates (in the sample procedures) “request[ing] parental/guardian consent” “[w]hen a student requests that their preferred name, gender identity, and/or gender expression be used”. Whether by design or otherwise, this vagueness will practically result in students’ being outed to their parent(s) or guardian(s) once they have “request[ed] that their preferred name, gender identity, and/or gender expression be used”, even if they are not “ready” to disclose their gender identity, and even if there is a “reasonabl[e] expect[ation] that gaining parental consent could result in physical, mental or emotional harm to the student”.

30. The Policy represents a significant and dangerous deviation from existing practice across school districts in Saskatchewan. Prior to August 22, 2023, there was no mandatory policy that school personnel be required to seek parental/guardian consent before using a student’s preferred name and pronoun in the school environment.

31. Teachers and school personnel were able to use — and did use in practice — their professional judgment and discretion to respect the student’s gender identity and expression without risking harm to the student by “outing” them to their parent(s) or guardian(s). Teachers were therefore able respect a student’s gender identity and expression in the school environment, including in one-on-one counselling conversations, without dangerously and unnecessarily placing the student at risk of psychological, emotional, or physical harm.

32. The Policy was evidently adopted without any consideration for the potential detrimental impacts that it could have on gender diverse students under the age of 16. The Government of Saskatchewan appears to have formulated and adopted the Policy without any consultation with experts on education or experts on the experience of gender diverse youth.

33. Premier Scott Moe admitted the lack of expert consultation in a public statement posted on the X platform (formerly Twitter) on August 27, 2023:



**F. The Policy violates section 15(1) of the *Charter***

34. The Policy violates the substantive equality rights of gender diverse students under section 15(1) of the *Charter*. Section 15(1) provides that:

Every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.

35. Both in purpose and effect, the Policy creates a distinction based on gender expression and identity, an analogous ground protected under section 15(1) of the *Charter*. The Policy creates a distinction that specifically targets gender diverse students under the age of 16.

36. Under the Policy, the preferred names and pronouns of cisgender students are consistently and automatically respected and observed within the school environment. By contrast, the Policy singles out gender diverse students under the age of 16 for differential and disadvantageous treatment. These students are required to receive parental consent before teachers and school personnel are permitted to acknowledge and respect their preferred names

and pronouns. The Policy therefore creates a clear distinction based on gender identity and expression.

37. The Policy also imposes a burden in a manner that has the effect of reinforcing, perpetuating, or exacerbating disadvantage. Specifically, the Policy imposes a burden on gender diverse students under the age of 16 by requiring school personnel to seek parental/guardian consent before using students' preferred names and pronouns in the school environment. For many gender diverse students, this creates an impossible choice: either continue being misgendered and deadnamed in the school environment, including in one-on-one counselling conversations with trusted teachers, or be outed to their parents, which could result in serious harm — emotional, mental, or physical.

38. Gender diverse people occupy a unique position of disadvantage within Canadian society, having faced discrimination in many facets of Canadian society. Gender diverse students are an especially vulnerable group. The Policy fails to take into account the unique vulnerability of these students. Indeed, the Policy has the effect of reinforcing, perpetuating, or exacerbating their unique disadvantage. It violates section 15(1) of the *Charter*.

39. The limit on the section 15 *Charter* right of gender diverse students is not reasonable and cannot be demonstrably justified in a free and democratic society. The Policy thus cannot be “saved” under section 1.

**G. The Policy violates section 7 of the *Charter***

40. The Policy deprives gender diverse students of their section 7 *Charter* right not to be deprived of security of the person except in accordance with the principles of fundamental justice. Section 7 provides that:

Everyone has the right to life, liberty and security of the person  
and the right not to be deprived thereof except in accordance  
with the principles of fundamental justice.

41. By requiring parental/guardian consent to use the preferred name and pronouns of students under the age of 16, the Policy exposes gender diverse students under the age of 16 to

psychological, emotional, and physical harm. The Policy imposes a *dangerous* condition on gender diverse students under the age of 16. Such students are only able access a safe and inclusive school environment *after* parental consent has been obtained.

42. For some gender diverse students under the age of 16, obtaining parental/guardian consent is not feasible. The Policy exposes these students to a serious risk of psychological, emotional, and even physical harm, either by requiring them to seek consent from their parent(s) or guardian(s) despite the consequences of doing so, or by outing the students to their parent(s) or guardian(s). The Policy therefore deprives these students of their right to security of the person.

43. This deprivation of security of the person is not in accordance with the principles of fundamental justice, including arbitrariness, overbreadth, and gross disproportionality. The Policy therefore infringes the section 7 *Charter* right of gender diverse students under the age of 16 not to be deprived of security of the person except in accordance with the principles of fundamental justice.

44. This infringement of the section 7 *Charter* right of gender diverse students under the age of 16 is not reasonable and cannot be demonstrably justified in a free and democratic society.

#### **H. The Policy is of no force and effect**

45. The Policy constitutes “law” within the meaning of section 52(1) of the *Constitution Act, 1982*. The Policy is a Ministerial Directive under s. 4.02 of *The Education Act, 1995*. School divisions — and by extension, individual schools and school personnel — have no discretion regarding the use of a student’s preferred pronouns. Pursuant to the Policy, school personnel will only be able to use a student’s preferred name and pronouns after the requisite parental/guardian consent has been obtained. The Policy constitutes a binding policy of general application, that is appropriately characterized as “law” for the purposes of section 52(1).

46. The Policy’s Outing Requirement and Misgendering Requirement each violate sections 7 and 15 of the *Charter* and cannot be saved by section 1. As such, these requirements are of no force and effect under section 52(1) of the *Constitution Act, 1982*. Since the Policy

as a whole cannot stand without these requirements, it is of no force and effect and should be struck down in its entirety under section 52(1).

**I. Costs**

47. UR Pride is a non-profit organization that has brought this *Charter* Application in the public interest. UR Pride should be relieved of any adverse costs award if its Application is unsuccessful.

**In support of this Application, the applicant relies on the following material or evidence:**

48. The following documentary evidence will be used at the hearing of this Application:

- (a) the affidavit of Ariana Giroux, affirmed August 31, 2023;
- (b) the affidavit of Dr. Travers, affirmed August 31, 2023;
- (c) the affidavit of A.B., affirmed August 30, 2023;
- (d) the affidavit of Corinne Pirot, affirmed August 31, 2023;
- (e) the affidavit of Nicholas Day, affirmed August 31, 2023; and
- (f) such further and other evidence as counsel may adduce and this Honourable Court may admit.

DATED at Toronto, Ontario, this 31<sup>st</sup> day of August, 2023.

**McCARTHY TETRAULT LLP**

Per:



Adam Goldenberg  
Counsel for the Applicants

This notice is issued at the above-noted judicial centre on the 31<sup>st</sup> day of August, 2023.



L. PICKERING  
A/ LOCAL REGISTRAR

A/ Local Registrar

#### NOTICE

You are named as a respondent because you have made or are expected to make an adverse claim with respect to this originating application. If you do not come to Court either in person or by your lawyer, the Court may make an order declaring you and all persons claiming under you to be barred from taking any further proceedings against the applicant(s) and against all persons claiming under the applicant(s). You will be bound by any order the Court makes. If you want to take part in the application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of this form.

The rules require that a party moving or opposing an originating application must serve any brief of written argument on each of the other parties and file it at least 3 days before the date scheduled for hearing the originating application.

If you intend to rely on an affidavit or other evidence when the originating application is heard or considered, you must serve a copy of the affidavit and other evidence on the originating applicant at least 10 days before the originating application is to be heard or considered.

#### CONTACT INFORMATION AND ADDRESS FOR SERVICE

ROBERTSON  
STROMBERG

ROBERTSON STROMBERG LLP  
Barristers & Solicitors



Lawyer in Charge of file: Sean M. Sinclair

Direct Line:

Facsimile:

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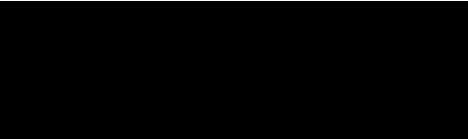


**Acting as agents for:**

mccarthy  
tetrault

**McCARTHY TETRAULT LLP**

Barristers & Solicitors



Lawyer in Charge of file: Adam Goldenberg

Direct Line:

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