FORM 25

NOTICE OF APPLICATION FOR LEAVE TO APPEAL
(*Pursuant to Rule 25 of the Rules of the Supreme Court of Canada*)

TAKE NOTICE that the Applicant hereby applies for leave to appeal to the Supreme Court of Canada, pursuant to *section 40 of the Supreme Court Act, R.S.C. 1985, c. S-26*, from the judgment of the British Columbia Court of Appeal in action number [redacted], made [redacted] for the reversal of the judgements pronounced on this date including an order finding the Applicant in contempt of court, and its associated fine with award of special costs to the Respondents, and the judgements made in the same court to settle the same order and certify special costs, pronounced on [redacted]

AND FURTHER TAKE NOTICE that this Application for leave is made on the following grounds:

1. Mitigating circumstances germane to the order of contempt against the Applicant were not considered nor tried in accord with relevant jurisprudence in *R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24 (para 29, 30, 35, 39, 40, 66, 72, 73), R. v. Hibbert, [1995] 2 S.C.R. 973 (para 52, 59), & Carey v. Laiken, 2015 SCC 17, [2015] 2 S.C.R. 79 (para 62, 66), Carey v. Laiken, 2015 SCC 17, [2015] 2 S.C.R. 79 (para 37).*

2. Pursuant to *Carey v. Laiken, 2015 SCC 17, [2015] 2 S.C.R. 79 (para 62, 66),* this court has found that previous contempt rulings may be reconsidered with respect to evidentiary components not previously tried.

3. Purging contempt in the object of justice requires a trial of the matters directly considered in S-229680 (file number CA-48965 in the British Columbia Court of Appeal).

4. The British Columbia Court of Appeal occasioned an onerous use of discretionary power in view of the foregoing (*Laiken v. Carey; Sabourin v. Laiken, 2011 ONSC 5892, para 23, Chong v. Donnelly, 2019 ONCA 799, para 9).*

AND FURTHER TAKE NOTICE that this Application for Leave raises the following issues of public importance:

1. This order being appealed in this Application has been used as grounds to dismiss the Applicant's Application to extend time to appeal BC Supreme Court matter S-229680 [redacted] a matter brought under the *Class Proceedings Act, R.S.B.C. 1996,c.50.* Whereas these matters properly inform each other, should a contempt order be used to obstruct justice?

2. Is the Canadian Judiciary willing to bankrupt, penalize, and/or incarcerate a Citizen before adducing the entirety of a lawfully provisioned evidentiary record?

3. Should Citizens accept victimhood when Government and/or state-sponsored agencies act antagonistic to or fall short of their mandates?

4. Does the Government of Canada insulate its agencies and sponsored private sector entities and Directors from prosecution?

5. In accord with official admissions by CAF leadership in the *Gosselin Reports* and other publications confirming InfoOps and PsyOps on targeting Canadian Citizens, has the CAF expanded such operations to include contracting social media influencers and CIMIC participants?

6. Are the principles of Common Law applicable in complex Civil matters which involve related criminal elements? Are they likewise applicable in quasi-criminal civil contempt matters? In the event they are not, would miscarriage in justice in the absence of these principles be justified?

Dated at Halifax, Nova Scotia this 2nd day of June, 2023.

[redacted]

Signature of Nathan K. Dempsey (Self-Represented

[redacted]

ORIGINAL TO:

Registrar
Supreme Court of Canada
310 Wellington Street
Ottawa, ON
K1A 0J1

COPIES TO:

[redacted]

APPLICANT'S MEMORANDUM OF ARGUMENT

PART I – STATEMENT OF FACTS

(A concise overview of your position with respect to the issues of public importance and a concise statement of facts.)

1. Case file S-229680 considers an account of widespread mischief and harassment linked to the Respondents on file, initiating in November 2021 prior to the filing of S-220956 and continuing to present. These events were first sworn in an Affidavit made May 20th, 2022 and remain to be tried in any capacity. Paragraphs 22 through 30 in the body of the Applicant's accompanying Affidavit made May 30th, 2023 summarize these events in brief, whereas the entirety of the same Affidavit contains a voluminous and complete account of all matters relevant in the Application. The **preface** in the same Affidavit describes the history of events with the Parties and defines the relevant action numbers and their distinction. Proper understanding of this matter will require review of the same Affidavit, and likewise, review of the Applicant's Affidavits in S-229680, sent via courier to the SCC Registry in the same box in cerlox-bound hardcopy, and DVD-ROM.

2. The Respondents to this Application include [redacted] the Attorney General of Canada. [redacted] is a CAGE company (Corporate and Government Entity), and whereas [redacted] is sponsored under the Canadian Federal Government's [redacted] program. Lead counsel for [redacted] serves as counsel and advisor to the Canadian Armed Forces ("CAF"). S-229680 includes a class of Respondents which await certification under the *Class Proceedings Act, R.S.B.C. 1996,c.50*, best described by the United Nations Office on Drugs and Crime as a "Hub" of online actors. The same are substantially related to the Respondents in the Style of Cause.

3. S-229680 further considers an account of widespread obstruction of justice in civil proceedings involving the Parties from inception. The Applicant's supporting Affidavits packaged with this Application contain supporting visual exhibits, chambers transcripts, communications, and shareholder record information.

4. Respondents [redacted] iled an Application to find the Applicant in contempt of court following the disclosure of a redacted version of the Applicant's second Affidavit in [redacted] on September 6th, 2022.

5. This Affidavit was redacted to remove visibility of any and all biographical and commercial data in accord with test criteria germane to *Sherman Estate v. Donovan, 2021 SCC 25* and *United States v. Meng, 2021 BCSC 1253.* Pursuant to paragraph 33 in *Meng*, germane to a strong public interest in understanding the contents of a matter, it might reasonably be posited that the Applicant's redactions of this Affidavit best reflect the tenets of the open court principle. The file was otherwise fully sealed, including

details of relevant events and public exhibit materials.

6. The purpose of the disclosure of the same Affidavit was to solicit support from potential interveners in view that customary recourse was unavailable. Defense of this disclosure is predicated on an excuse of necessity this court has validated in R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24 as is furnished in **Part III (Statement of Argument)**. Pursuant to the judgment in Ruzic, the accused is afforded a defense of due-diligence in the absence of a safe avenue of escape. The legal test involves evidence in seeking the same diligently. The Applicant meets this legal test through copious records involving unfruitful recourse to law enforcement and customary support channels. The matter was not considered in proceedings despite being raised a number of times prior to disclosure. Trial of the necessitating factors as outlined in paragraph (1) is required to purge contempt in a trial that places all relevant considerations before the court in the object and proportion of justice.

7. In consideration of *Carey v. Laiken, 2015 SCC 17, [2015] 2 S.C.R. 79 (para 37),* the Applicant had a demonstrated history in complying with and conducting himself in accord with existing sealing orders, including calling for the same when appropriate. This is evident in;

    a) The initial consensual sealing order in [redacted] pronounced August 21st, 2021;
    b) The sealing order initiated by the Applicant on S-220956 when it was opened on February 8th, 2022; and;
    c) From inception through to September 6th, 2022, when the Applicant's redacted Affidavit was forwarded to a basket of potential interveners in the midst of exceptionally difficult circumstances as outlined in paragraph (1).

    In accord with the same jurisprudence, this occasions the court to exercise its discretion regarding factors and events germane to the disclosure.

8. Of relevance to this Application is consideration of various modalities of censorship by way of sealing order. These include multiple sealing and protection orders over public social media evidence, the sealing of S-229680 in its entirety prior to the respondents accepting service of the pleadings, the removal of case materials at the registry, and a protection (restraining) order made in June 2022 absent any evidence it was required. The same protection order was duplicated across all subsequent hearings germane to the sealing of materials following that date, whereas the most compelling example of censorship being the Applicant's first Affidavit in S-228567, which contains only public social media exhibits available via google search, and no body of statements. In all of these accounts, counsel for the Attorney General of Canada took no position (on its own open court legislation), and refused to attend hearings.

9. This Application is supported by a Motion to Extend time to Appeal, initially submitted to the SCC on May 23rd, 2023. Per the instructions of the court, the same motion is resubmitted alongside this Application. Delay in seeking leave to Appeal the [redacted]

[redacted] is due to the relief sought in paragraph 57(j) in the S-229680 Notice of Civil Claim, which is tantamount to an appeal of the order.

10. The public has a compelling interest in knowing it can trust our judicial system to grant access to justice, and most especially, grant access to justice for all citizens, regardless of disparity in power, money, and influence between parties. An absence of this allows for a privilege-based caste system where civil rights can be trampled. In this Application, it means a provision from the court to adduce all components of a lawfully-provisioned evidentiary record. A similar order was made on April 1st, 2022 with respect to privileged shareholder records in S-220956; an order which was subsequently suppressed as is shown in the Applicant's first Affidavit in S-229680. A trial of S-229680 is expected to succeed by way of access to records information lawfully provisioned under section 241(3.1) of the Income Tax Act.

11. In an absence of recourse, the common issues and wrongdoing outlined in S-229680 will remain untried, and the Respondents will be awarded over $70,000 CAD in special costs. This amount is expected to exceed $200,000 CAD in costs concerning the dismissal of S-229680 in the BC Supreme Court. For further context, S-229680, a matter brought under *Class Proceedings Act, R.S.B.C. 1996,c.50*, was dismissed by a chambers judge in violation of nine (9) rules governing the Style of Proceedings.

12. This Application further considers the settling of the same order by [redacted] The Registrar certified an egregious award of special costs requested by Respondents [redacted] in an amount *ten times* customary legal fees. This amount was predicated on the assertion of counsel fo[redacted]hat his "*usual lawyers were on vacation*".

13. By way of the foregoing, as a minimum consideration to the proportion of justice and precedent, the public might rightfully demand that lawfully provisioned audit data first be reviewed before the matter is closed beyond any recourse.

14. [redacted] justice [redacted] leveraged the order being appealed in this Application to dismiss the Applicant's Application to extend time to appeal in S-229680. In doing so, the court imposed a reverse onus on proceedings whereas each matter rightly informs the other. An Application for leave to appeal the same order is filed alongside this Application.

15. The Applicant is a self-represented litigant ("SRL") and has been unable to obtain counsel since November 2021 through to present, including ProBono, as is exampled in supporting Affidavits (First Affidavit S-229680 pages 60-64, Third Affidavit S-229680, page 98). Negligence on the part of counsel is in[redacted] documented in the Applicant's supporting Affidavits and is central to the background of matters concerning the Parties (First Affidavit S-229680, pages 77-78). This court, in *Pintea v. Johns, 2017*

SCC 23, [2017] 1 S.C.R. 470, based on the *Principles of Self-Represented Litigants and Accused Persons, 2006,* has rejected the premise that lawyers and SRL's enter the judicial arena on an equal footing.

PART II – STATEMENT OF THE QUESTIONS IN ISSUE

(A concise statement of the questions in issue, including any constitutional issue.)

16. Is the court willing to bankrupt, penalize, and/or incarcerate a Citizen before adducing the entirety of a lawfully provisioned evidentiary record?

17. Is jurisprudence germane to Common Law applicable in complex Civil matters which involve related criminal elements? Likewise, if they aren't, is miscarriage in justice resulting in crippling loss in the absence of these principles justified when it could be otherwise prevented?

18. Should Citizens be punished for seeking help when customary recourse fails, and should Citizens accept victimhood when Government and/or state-sponsored agencies act antagonistic to or fall short of their mandates?

19. The order being appealed in this Application has been used as grounds to dismiss the Applicant's Application to extend time to appeal BC Supreme Court matter S-229680 [redacted], a matter brought under the *Class Proceedings Act, R.S.B.C. 1996,c.50.* Whereas these matters properly inform each other, should a contempt order be used to obstruct justice?

20. Does the Government of Canada insulate its agencies and sponsored private sector entities and Directors from prosecution?

21. In accord with official admissions by CAF leadership in the *Gosselin Reports* and other publications confirming InfoOps and PsyOps on targeting Canadian Citizens, has the CAF expanded such operations to include contracting social media influencers and CIMIC participants?

PART III – STATEMENT OF ARGUMENT

(A concise statement of argument.)

Exceptionally High Threshold

22. The power to adjudicate contempt in a civil court is discretionary, and is expected to be exercised with "*great restraint"* (*Laiken v. Carey; Sabourin v. Laiken, 2011 ONSC 5892, para 23, Chong v. Donnelly, 2019 ONCA 799, para 9).* Great restraint in this case is commonly understood to mean that the discretionary power of the court to punish in any capacity is used as a "last resort" (*Laiken*, paragraph 36). This further suggests that

prior to pronouncing contempt, the court will make diligent efforts to explore all aspects of a lawfully-provisioned evidentiary record. The court did not conduct itself in accord with this high threshold on November 3rd, 2022.

23. In adding further weight to the foregoing statement, the Appellant has a demonstrated history in complying with and conducting himself in accord with existing sealing orders, including calling for the same when appropriate. In accord with *Carey v. Laiken, 2015 SCC 17, [2015] 2 S.C.R. 79 (para 37)* and longstanding jurisprudence for discretionary exercise of its power to punish under extreme circumstances, the court is reasonably expected to explore circumstances around what may have necessitated disclosure of the redacted Affidavit on September 6th, 2022. No such consideration was made.

Conduct of the Appellate Court

24. The court did not consider mitigating circumstances outlined in paragraph (1) and the defense of excuse in necessity these circumstances occasion in accord with customary precedent in this court. Account of these ongoing ongoing events were first sworn in an Affidavit on May 20th, 2022, four months prior to disclosure of the redacted Affidavit cited by Respondents [redacted] Counsel for [redacted] threatened to strike Petition S-220956 when this Affidavit was enroute from Halifax to Vancouver. Following this, a protection order was placed over the file at the request of [redacted] absent any evidence the same was required, and atop an existing sealing order over the entire file. The Applicant broached these concerns in proceedings though no treatment of the same was permitted to unfold.

25. Likewise, proceedings over this time period suppressed an initial order made regarding petition S-220956 on April 1st, 2022. During this hearing, the court identified the matter as “complex”, and ordered discovery provisions involving the Canada Revenue Agency, and ordered the parties to seek direction on the mode of service on three private entities in the interest of introducing testimony and privileged information into the evidentiary record. The same order was obstructed and ultimately dismissed in a series of private hearings that followed as is outlined in the Applicant’s accompanying Affidavit. By September 2022, it became evident that civil proceedings were biased in favor of the Respondents.

No Recourse to Police or Safe Avenue of Escape

26. Diligent but unsuccessful efforts were made in seeking relief of ongoing harassment and mischief connected to the Respondents through recourse to law enforcement. Prior to the Applicant’s relocation from British Columbia to Nova Scotia as a result of these events in February 2022, the Applicant sought recourse to the RCMP in Surrey, BC prior to the filing of S-220956. The RCMP listened but refused to open a file or investigate. The Department of Justice ignored the Applicant’s citations of these events. Halifax Regional Police (“HRP”) did likewise, initially suggesting the events would cease “when the lawsuit against [redacted] was dropped”. All the while, on-heels and online

harassment continued on a day-to-day basis as is chronicled in the Applicant's Affidavits.

27. HRP, eventually having met with the Applicant, validated the Appellant's evidentiary record in a meeting the Applicant covertly recorded (section 183.1, Canadian Criminal Code). The official report of the same meeting, obtained via Freedom of Information Request ("FOIPOP"), gave a false account and denied any evidence of the same. HRP later refused to accept service of an Application to join the same to S-229680, the same being served pursuant to the BCSC rules and the *BC Court Jurisdiction and Proceedings Transfer Act*. The same is true in the oral reasons of Justice [redacted] paragraph 36, whereas the Appellate court denied the Applicant's evidentiary record with respect to judicial and police misconduct. There was at no material time a safe avenue of escape from ongoing and systemic harassment and mischief. The events cited in this paragraph took place following the order of justice [redacted] though whereas, it is entirely consistent with the remainder of the Applicant's evidentiary record.

28. By way of the seal and protection order over the entirety of the file, there was no reasonable expectation of intervention from the public. The reason for this is simply because the public was not informed these events were happening, and further, disclosure of the same would invite penalty, as had been applied for by counsel for [redacted] The argument for an excuse based on necessity is predicated on the foregoing conditions coupled with the severity of ongoing events.

Redacted Affidavit

29. The Applicant's redacted Affidavit meets test criteria for the open court principle in accord with *Sherman Estate v. Donovan, 2021 SCC 25* and *United States v. Meng, 2021 BCSC 1253.* It contains no biographical information or proprietary commercial information germane to the legal test. It does contain a customary account of relevant events pursuant to paragraph 33 in *Meng*, germane to the strong public interest in understanding the contents of a court file.

Jurisprudence

30. This court has championed a defense of due diligence to the accused in matters germane to the account provided in this Application.

    a) *"At the heart of this defense is the perceived injustice of punishing violations of the law in circumstances in which the person had no other viable or reasonable choice available; the act was wrong but it is excused because it was realistically unavoidable."*
    R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24, Paragraph 29

    b) *"Without requiring a full mens rea, the Court decided that, generally speaking, absent very clear and explicit language to the contrary, at least a defense of due diligence should be available to the accused. This form of penal responsibility*

had to be grounded on an element of voluntariness, the choice left to the accused being at least that of acting with due diligence, to avoid convicting innocents (p. 1313).”
R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24, Paragraph 35

c) *“Moral involuntariness is also related to the notion that the defense of duress is an excuse. Dickson J. maintained in Perka that an excuse acknowledges the wrongfulness of the accused’s conduct. Nevertheless, the law refuses to attach penal consequences to it because an “excuse” has been made out. In using the expression “moral involuntariness”, we mean that the accused had no “real” choice but to commit the offense. This recognizes that there was indeed an alternative to breaking the law, although in the case of duress that choice may be even more unpalatable – to be killed or physically harmed.”*
R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24, Paragraph 39

d) *“Excuses absolve the accused of personal accountability by focussing, not on the wrongful act, but on the circumstances of the act and the accused’s personal capacity to avoid it.”*
Fletcher, supra, at p. 798

e) *“Notably, at common law, there is no requirement that the threats be made by a person who is present at the scene of the crime. It has been said that the threat must be “immediate” or “imminent” and that persons threatened must resort to the protection of the law if they can do so. While the defense is not available to those who have “an obvious safe avenue of escape”, I agree with Martin J.A. that the operative test is “whether the accused failed to avail himself or herself of some opportunity to escape or render the threat ineffective.”*
R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24, Paragraph 66

f) *“The appellant and respondent voiced conflicting views about the existence of any immediacy requirement in the English law of duress. English courts seem to have opted for a flexible test that requires that there be a close temporal connection between threat and harm. The threat need not operate instantly, but must be a present one in the sense that it creates an immediate pressure to act (see R. v. Hudson, [1971] 2 Q.B. 202 (C.A.), at pp. 206-7).”*
R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24, Paragraph 72

g) A defense of necessity by way of excuse *“..rests on a realistic assessment of human weakness, recognizing that a liberal and humane criminal law cannot hold people to the strict obedience of laws in emergency situations where normal human instincts, whether of self-preservation or of altruism, overwhelmingly impel disobedience. The objectivity of the criminal law is preserved; such acts are still wrongful, but in the circumstances they are excusable. Praise is indeed not bestowed, but pardon is, when one does a wrongful act under pressure which, in*

the words of Aristotle in the Nicomachean Ethics [Book III, 1110a (trans. D. Ross, 1975, at p. 49)] "overstrains human nature and which no one could withstand".
R. v. Hibbert, [1995] 2 S.C.R. 973, Paragraph 52

h) *“This Court has previously indicated that when assessing the reasonableness of an accused's conduct for the purposes of determining whether he or she should be excused from criminal responsibility, it is appropriate to employ an objective standard that takes into account the particular circumstances of the accused, including his or her ability to perceive the existence of alternative courses of action.”*
R. v. Hibbert, [1995] 2 S.C.R. 973, Paragraph 59

i) *“Contempt proceedings are subject to the standard principles that allow parties to reopen findings in exceptional circumstances to permit consideration of fresh evidence or new facts that were not before the court at the first hearing.”*
Carey v. Laiken, 2015 SCC 17, [2015] 2 S.C.R. 79, paragraph 62

Purging Contempt

31. Purging contempt in the object and proportion of justice does not result from paying exorbitant fees in the absence of a fair hearing. Furthermore, it does not abide the certification of exorbitant special costs predicated on a Respondent’s vacation schedule. Likewise, a material distinction between civil and criminal matters in the interpretation of jurisprudence would ignore the object and proportion of justice. This is a complex civil matter with related criminal components. Contempt of court proceedings are understood to be quasi-criminal in nature. Purging contempt in consideration of the foregoing, in accord with the object and proportion of justice, involves consideration of the components necessitating the disclosure of the Applicant’s redacted Affidavit.

Substance of S-229680

32. Matters of obstruction of justice in proceedings, denial of recourse to police, and ongoing harassment connected to the respondents form the basis of considerations in S-229680. The necessitating events as cited in paragraph (1) are directly considered in this file in a modality of relief. The Appellate court’s mishandling of contempt proceedings on [redacted] comprises one component in a chain of related events which have precluded the Applicant’s access to justice and protected the Respondents on file. By means of the same, the three Applications for Leave to Appeal being filed concurrently inexorably inform one another.

33. [redacted] struck the Applicant’s application to extend time to appeal S-229680, reading an oral reasons document immediately following the Applicant’s submissions. This document required fifteen minutes to read, suggesting her decision was made prior to the hearing. The dismissal was predicated on the [redacted] under consideration in this Application, and the

order of justice [redacted] Merit in S-229680 was not considered in its own right, nor were circumstances involving nine (9) procedural violations by the BCSC and its refusal to respond to five corrective letters filed under PD-27 over the span of ten weeks. Justice [redacted] claimed that because of the contempt rulings which had not been tried, a trial of S-229680 cannot proceed, which would invariably be positioned to address a defense of excuse based on necessity. This reverse onus is antagonistic to the object and proportion of justice.

34. A trial of the common issues in S-229680 is required to inform all matters germane to this Application. Refusal to grant leave will inexorably lead to the destruction of the Applicant's life savings and enable the events outlined in the accompanying Affidavit to continue unaddressed. There is no reasonable basis for the same in view of the foregoing account, and relevant jurisprudence. Further relevant privileged information is lawfully adduced by means of ITA 241(3.1). Recommendations are reflected in Part V.

PART IV – SUBMISSIONS IN SUPPORT OF ORDER SOUGHT CONCERNING COSTS

(Submissions, if any, not exceeding one page in support of the order sought concerning costs.)

35. The Applicant is a self-represented litigant. The matter of retaining counsel is a materially relevant component in these matters as is outlined in supporting Affidavits. Whereas the workload required in treating this matter consumes considerable time, it is difficult to place an arbitrary value on costs, besides the costs of materials, services, and other supportive requirements yielding receipts.

36. As is detailed in the two other Applications accompanying this one, the British Columbia Court of Appeal published oral reasons germane to these hearings mischaracterizing the Applicant which are harmful to the Applicant.

PART V – ORDER OR ORDERS SOUGHT

(The order or orders sought, including the order or orders sought with respect to costs.)

37. Overturn the [redacted] order of justice [redacted] finding the Applicant in contempt of court. On the alternative, adjourn such an order until a trial of common issues germane to necessitating factors in paragraph (1) is completed. The latter contemplates an Appeal of S-229680.

38. Overturn the [redacted] order of [redacted] settling the [redacted] and the certification of costs and special costs made in the same pronouncement.

[redacted]

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Signature of Nathan K. Dempsey (Applicant)

Part VI - TABLE OF AUTHORITIES

Legislative enactments, case law, articles, texts and treaties	Paragraph/section #
39. *Sherman Estate v. Donovan, 2021 SCC 25*	*7, 63*
40. *United States v. Meng, 2021 BCSC 1253*	*33*
41. *R. v. Ruzic, [2001] 1 S.C.R. 687, 2001 SCC 24*	*29, 30, 35, 39, 40, 66, 72, 73*
42. *R. v. Hibbert, [1995] 2 S.C.R. 973*	*52, 59*
43. *Carey v. Laiken, 2015 SCC 17, [2015] 2 S.C.R. 79*	*37, 62, 66*
44. Pintea v. Johns, 2017 SCC 23, [2017] 1 S.C.R. 470	*4*

PART VII – LEGISLATION

45. Charter of Rights and Freedoms
46. Bill of Rights
47. Class Proceedings Act, R.S.B.C. 1996,c.50

DOCUMENTS IN SUPPORT WITH RELEVANT CITATIONS

(All Affidavits are bound in cerlox and have been Couriered to the Registry)

Note: *These affidavits contain exhibits concerning all relevant topics for use at the hearing of the three Applications for Leave to Appeal, and subsequently, if granted, for use in the Appeal of the same matters.*

[redacted]