

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

SUPERIOR COURT
(Class Action Division)

N°: 500-06-001278-239

D.G.
and
A.L.
and
L.S.

Applicants

v.

CONCORDIA UNIVERSITY
and
CONCORDIA STUDENT UNION

Defendants

**APPLICATION FOR THE DISCLOSURE OF THE NAMES OF THE PROPOSED
REPRESENTATIVES TO CONCORDIA UNIVERSITY'S ATTORNEYS AND
REPRESENTATIVES**

(Articles 12, 49 and 99 *Code of Civil Procedure*)

**TO THE HONOURABLE DONALD BISSON, J.C.S., CASE MANAGEMENT JUDGE
DESIGNATED IN THESE PROCEEDINGS AND SITTING IN THE CLASS ACTION
DIVISION IN AND FOR THE DISTRICT OF MONTREAL, THE DEFENDANT
CONCORDIA UNIVERSITY SUBMITS THE FOLLOWING:**

I. INTRODUCTION

1. Through this Application, Concordia University ("**Concordia**") seeks the disclosure of the identity of the Applicants D.G., A.L., and L.S. ("**Proposed Representatives**") in anticipation of the hearing for the *Application to Authorize the Bringing of a Class Action & To Appoint the Applicants as Representatives* ("**Application for Authorization**").

II. THE PROPOSED CLASS ACTION

2. On November 16, 2023, the Proposed Representatives filed the Application for Authorization on behalf of the following members of the Concordia community:
 - a) All Jewish students currently enrolled at Concordia;
 - b) All Jewish students who attended Concordia within the last three years but are no longer students at Concordia;

- c) All Jewish faculty and staff members currently employed at Concordia; and
- d) All Jewish faculty and staff members who were employed by Concordia within the last three years but are no longer faculty and staff members at Concordia;

collectively described as the “**Proposed Class**”, all as appears from the Application for Authorization.

3. The Proposed Representatives allege that Concordia has been negligent in responding to antisemitism on campus and that its conduct allowed antisemitic incidents to occur on its campuses. Further, they allege that Concordia should also be liable for the actions and omissions of its faculty and staff members (who have either committed antisemitic acts or failed to intervene to prevent or sanction them), as well as for the actions and omissions of the Concordia Student Union (“**CSU**”) or other student organizations, as it appears from the Application for Authorization.
4. Consequently, the Proposed Representatives claim the following, on behalf of the Proposed Class, from Concordia and the CSU:

- a) General damages, temporarily evaluated at \$10,000,000;
- b) Punitive damages, temporarily evaluated at \$5,000,000;

all as appears from the Application for Authorization.

III. THE NON-IDENTIFICATION OF THE PROPOSED REPRESENTATIVES

5. The Application for Authorization does not identify the Proposed Representatives, instead describing them only as follows:
 - a) D.G., who is alleged to be a current student at Concordia;
 - b) A.L., who is alleged to be a current student at Concordia;
 - c) L.S., who is alleged to be a current professor at Concordia and “possesses an extensive résumé as an academician, a consultant, as well as a published author”;

the whole as appears from paragraphs 5 to 7 of the Application for Authorization.

6. The names of the Proposed Representatives have not been disclosed to Concordia nor its attorneys.
7. In the Application for Authorization, the Proposed Representatives state that they intend to seek an order to keep themselves and other class members anonymous from the public, as appears from paragraph 8 of the Application for Authorization.
8. In this respect, it is alleged that, given the nature of the Application for Authorization, the Proposed Representatives fear that being publicly identified with

this lawsuit could result in retaliation and retribution, including physical intimidation and assault, as appears from paragraph 8 of the Application for Authorization.

9. The Application for Authorization further alleges the following:

“9. Indeed, many Jewish students at Concordia have already been physically assaulted and discriminated against by their fellow students and faculty at the University purely because they are Jewish. The most recent example of this is a riot that took place at Concordia on November 8, 2023; Jewish students were attacked by a mob of protesters for hosting a tabling event that advocated for Israel. That same day, swastikas were found in a Concordia university building.

10. Students who advocate for their community in even relatively minor and isolated forms, such as speaking up in classroom discussion, have faced retribution from their professors, including deductions to their grades.

11. In general, Jewish individuals in Montreal have faced a stark rise in anti-Semitic hatred in recent weeks. In just the first two weeks of November 2023 alone, two Jewish schools in Montreal were shot at, several Jewish-owned businesses were vandalized, and a synagogue and the office of a Jewish advocacy organization were targeted with attempted arson.”

10. Further, the Application for Authorization states that “[p]ublicly identifying with a large-scale class action of this nature would put the Representative Plaintiffs at significant risk of harm”, reiterating that the Proposed Representatives and the other class members should be kept anonymous from the public, as appears from paragraph 12.
11. Accordingly, as confirmed in a recent communication with the Court, it is understood that the Proposed Representatives will file an application pursuant to Article 12 of the *Code of Civil Procedure* (“**CCP**”) seeking an exception to the open-court principle and to have their identities, as well as those of any Proposed Class member, protected from the public by means of a publication ban and/or confidentiality order.
12. In respect of this forthcoming application to keep the Proposed Representatives and any Proposed Class member anonymous from the public, Concordia defers to the judgment of the Court.
13. That said, as will be addressed below, neither the Application for Authorization nor any subsequent communication with the attorneys for the Proposed Representatives address the right of the defending parties to the disclosure of the identity of the Proposed Representatives.
14. Accordingly, by way of the present Application, Concordia seeks to obtain the disclosure of the identity of the Proposed Representatives in a manner consistent with any forthcoming judgment that may be rendered regarding the public-facing anonymity of the Proposed Representatives and any Proposed Class members.

IV. CONCORDIA'S EFFORTS TO OBTAIN DISCLOSURE

15. From the outset of the proceedings, Concordia, through its attorneys, has sought the disclosure of the names of the Proposed Representatives to ensure its unencumbered right to a full and complete defence.
16. On December 21, 2023, Concordia's attorneys reiterated their request to the attorneys for the Proposed Representatives to communicate the proposed modalities for the disclosure of the identity of the Proposed Representatives to Concordia's attorneys and representatives for the purpose of respecting Concordia's right to a full and complete defence, as appears from a copy of the letter dated December 21, 2023, **Exhibit CU-1**.
17. It is important to highlight that the object of Concordia's request is not the public dissemination of the identify of the Proposed Representatives, but rather the disclosure to the defending parties to a litigation of the names and identities of the persons bringing suit against them.
18. On February 28, 2024, the attorneys for Concordia stated to the Court that, without the names of the Proposed Representatives, Concordia is unable to take a position on any preliminary applications it may make and announced its intention to file a declinatory exception to seek the partial dismissal of the Application for Authorization, as appears from the Joint Response to the Court, dated February 28, 2024, **Exhibit CU-2**.
19. Indeed, the present Application is filed under reserve and without prejudice to the declinatory exception that Concordia intends to file regarding the claims of at least one Proposed Representative.

V. CONCORDIA'S RIGHT TO A FULL AND COMPLETE DEFENCE

20. The right to a full and complete defence, which exists at all stages of class action proceedings, requires the disclosure of the identity of the Proposed Representatives to Concordia's attorneys, senior members of its administration, and certain other administrators, as identified by title or position in Annex A of the present Application (collectively the "**Concordia Representatives**").
21. The individuals identified in Annex A have a role either (i) in the internal inquiry to be carried out in respect of the detailed factual allegations of the Application for Authorization as it relates to the cause of action of each of the Proposed Representatives or (ii) the decisions to be made in respect of Concordia's defence regarding the Application for Authorization.
22. Such disclosure is essential as this information may be determinative in both the factual and legal analysis that Concordia must carry out to assess both the need for and the scope of its declinatory exception(s) and any preliminary applications it may make. This information will further inform the position it may take in respect of the authorization criteria that are central to its potential contestation of the Application for Authorization.

23. By withholding their respective identities, the Proposed Representatives are jeopardizing Concordia's right to a full and complete defence in the context of the Application for Authorization.

VI. SAFEGUARDS TO ENSURE THE CONFIDENTIALITY OF THE IDENTITY OF THE PROPOSED REPRESENTATIVES

24. If the Court orders the attorneys for the Proposed Representatives to disclose their names to Concordia's attorneys and the identified Concordia Representatives, Concordia undertakes to protect the identity of the Proposed Representatives in conformity with any orders to be rendered on the public-facing anonymity of the Proposed Representatives.

25. Such measures may include refraining from the following:

- a) Publishing or disclosing any information identifying the Proposed Representatives, except between parties and their respective attorneys, in accordance with the conclusions below, and solely for the purposes of the present litigation; and
- b) Revealing the identity of the Proposed Representatives, with the exception of discussions and communications between the parties and their attorneys.

26. The implementation of such measures will ensure the preservation of the dignity of Proposed Representatives while allowing Concordia to assert its rights to a full and complete defence at the authorization stage.

VII. CONCLUSIONS

27. It is in the interests of the parties and the administration of justice that the identities of the Proposed Representatives be disclosed to Concordia's attorneys and the identified Concordia Representatives, with the above-mentioned modalities.

28. The present application is well founded in fact and law.

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

GRANT the present Application for the Disclosure of the Identity of the Proposed Representatives;

ORDER the attorneys for the Proposed Representatives to communicate the identity of the Proposed Representatives to Concordia's attorneys within 15 days of the issuance of the judgment on the present Application for the Disclosure of the Identity of the Proposed Representatives;

ALLOW the attorneys for Concordia to communicate the identity of the Proposed Representatives to the individuals identified in Annex A.

REQUIRE that each of the individuals identified in Annex A be informed of the conditions for disclosure and undertake to refrain from the following:

- a) Publishing or disclosing any information identifying the Proposed Representatives, except between parties and their respective attorneys, in accordance with the above conclusions and solely for the purposes of the present litigation;
- b) Revealing the identity of the Proposed Representatives, with the exception of discussions and communications between the parties and their attorneys; and
- c) Any other condition this Court may deem reasonable.

THE WHOLE without costs, unless contested.

Montreal, April 5, 2024

Langlois lawyers LLP

LANGLOIS LAWYERS, LLP

Me Elisabeth Neelin

LANGLOIS LAWYERS LLP

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Attorneys for Defendant Concordia University

O/☎: 342038.0002

Annex A

- Legal Services
 - All staff, including administrative assistants
- Senior Administrators (limited number)
 - Secretary-General and General Counsel
 - Provost and Vice-President, Academic
 - Deputy Provost and Vice-Provost, Enrollment and Student Experience
 - Vice-President, Services and Sustainability
 - Executive Director, University Communications Services
 - Communications Manager, Institutional Affairs
 - Chief Communications Officer
- Dean of Students Office
 - Dean of Students
- Equity Office
 - Executive Director, Equity Office
- Office of Rights and Responsibilities
 - Director, Office of Rights and Responsibilities
 - Associate Advisor, Office of Rights and Responsibilities
- Campus Safety and Prevention Services
 - Director, Campus Safety and Prevention Services
 - Assistant Director, Campus Safety and Prevention Services
- Labour Relations
 - Associate Vice-President, Human Resources

NOTICE OF PRESENTATION

TO:

Me Eric De Louya Me Tom Markakis DE LOUYA MARKAKIS 428, Saint-Pierre Street, Suite 101 Montreal, QC H2Y 2M5 Lawyers for Applicants	Me Adam Eidelmann EIDELMANN LAW INC. 8000, Decarie Blvd, Suite 430, Montreal, QC H4P 2S4 Lawyers for Applicants
Me Tommie Anne Côté Me Carolena Gordon CLYDE & Co CANADA 630, René-Lévesque Blvd. West, Suite 1700 Montreal, QC H3B 1S6 Lawyers for Defendant Concordia Student Union	Me Martin Côté ROBINSON SHEPPARD SHAPIRO 800, du Square-Victoria Street, Suite 4600 Montreal, QC H4Z 1H6 Lawyers for Defendant Concordia Student Union

TAKE NOTICE that the *Application for the Disclosure of the Names of the Proposed Representatives to Concordia University's Attorneys and Representatives* will be presented for decision to the Honourable Donald Bisson, j.c.s., as soon as counsel can be heard, at the Montreal Courthouse, located at 1, Notre-Dame Street East, Montreal.

DO GOVERN YOURSELF/YOURSELVES ACCORDINGLY.

Montreal, April 5, 2024



LANGLOIS LAWYERS, LLP

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**CONCORDIA UNIVERSITY
and
CONCORDIA STUDENT UNION**

Defendants

LIST OF EXHIBITS

CU-1: Letter from Me Neelin to Class Counsel dated December 21, 2023;

CU-2: Joint Response to the Court, dated February 28, 2024.

Montreal, April 5, 2024

Langlois lawyers LLP

LANGLOIS LAWYERS, LLP

Me Elisabeth Neelin

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LANGLOIS

AVOCATS - LAWYERS

Montreal, December 21, 2023

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Me Eric De Louya

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Montreal, QC H4P 2S4

Subject: D.G. and A.L. and L.S. v. Concordia University and Concordia Student Union
S.C.M.: 500-06-001278-239
Our ref.: 342038.0002
Your ref.: ED-A-704.1

Dear Colleagues:

Following the notification of our *Answer to Summons* on behalf of Concordia University in the above-captioned matter, we must reiterate our request that you provide our firm with your proposed modalities for the disclosure of the names of the Applicants. To respect our client's right to a full and complete defence, these modalities should include proposals for disclosure to both our firm and representatives of the University.

We understand from paragraphs 8 through 11 of the *Application to Authorize the Bringing of a Class Action and to Appoint the Applicants as Representatives* that you and your colleagues intend to file an application in respect of the public-facing anonymity of the Applicants. Such an application should not, however, affect the rights of defending parties.

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16233360v1



We ask that you revert with proposed modalities for disclosure at your earliest convenience. Should you remain unwilling to consider disclosure, we will take steps to seize the Court of this question at the next opportunity.

Sincerely,

Langlois Lawyers, LLP

A handwritten signature in blue ink, appearing to read 'Elisabeth Neelin'.

Elisabeth Neelin

EN/

c.c. Me Martin Côté, Robinson Sheppard Shapiro LLP
Me Jean-Pierre Sheppard, Robinson Sheppard Shapiro LLP
Me Juliana Boutot, Robinson Sheppard Shapiro LLP
Me Carolena Gordon, Clyde & Co Canada LLP
Me Tommie Anne Côté, Clyde & Co Canada LLP

De: Eric Delouya <ed@delouyamarkakis.com>
Envoyé: 28 février 2024 18:09
À: donald.bisson@judex.qc.ca
Cc: Tom Markakis; Jean-Pierre Sheppard; Adam Eidelmann; Cynthia Declementi; Côté, Me Tommie Anne ; mcote@rsslex.com; Me Elisabeth Neelin; jboutot@rsslex.com; Gordon, Carolena
Objet: Re: Demande du juge coordonnateur - 500-06-001278-239 / D.G., A.L., L.S. c. Concordia University, et al.
Pièces jointes: image005.png; image006.jpg; image007.png; UBC CLASS ACTION.pdf; YORK CLASS ACTION.pdf; QUEENS CLASS ACTION.pdf; TMU CLASS ACTION.pdf

* Courriel de l'externe - Soyez vigilant / External email - Please exercise caution *

Cher Monsieur le juge,

Vous trouverez ci-dessous les réponses des Demandeurs en rouge et celles des défendeurs en vert.

Nous demeurons à votre disposition afin d'organiser une conférence pour nous entendre sur les prochaines étapes.

Bien à vous.

Eric De Louya, avocat - attorney
DE LOUYA MARKAKIS, avocats/attorneys
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From: Donald Bisson <donald.bisson@judex.qc.ca>
Sent: Friday, January 19, 2024 10:38 AM
To: Gordon, Carolena <Carolena.Gordon@clydeco.ca>; Eric Delouya <ed@delouyamarkakis.com>; Tom Markakis <tm@delouyamarkakis.com>; Adam Eidelmann <ae@eidelmannlaw.ca>; Cynthia Declementi <Cynthia.Declementi@langlois.ca>; Côté, Me Tommie Anne <TommieAnne.Cote@clydeco.ca>; mcote@rsslex.com; Neelin, Elisabeth <elisabeth.neelin@langlois.ca>; 'Jean-Pierre Sheppard' <jpsheppard@rsslex.com>; jboutot@rsslex.com
Cc: Louise Péloquin <louise.peloquin@judex.qc.ca>
Subject: Demande du juge coordonnateur - 500-06-001278-239 / D.G., A.L., L.S. c. Concordia University, et al.

Merci.

Vu le dépôt des réponses dans ce dossier, je désire connaître sommairement vos intentions en ce qui concerne son déroulement aux fins de décider, le cas échéant, qui sera le ou la juge désigné.e pour assurer la gestion particulière de cette affaire. Si j'ai oublié un avocat, svp me le dire.

À cet effet, je vous demande de répondre aux questions suivantes, et ce, par une SEULE lettre commune (ou courriel) pour l'ensemble des parties, dans les 30 jours de la réception de la présente dans la mesure du possible :

- 1. Y a-t-il un dossier connexe institué au Québec ou dans une autre province canadienne?**

Le cas échéant, veuillez joindre la ou les procédures connexes et m'indiquer les dates de production de chaque demande ainsi que si le dossier du Québec est le premier ou non à avoir été introduit.

Il n'existe au Québec aucun dossier connexe. Cependant, dans le reste du Canada la firme *Diamond & Diamond Lawyers LLP*, avec qui nous collaborons, a intenté des actions collectives similaires contre quatre établissements d'enseignement postsecondaire au Canada soit l'Université métropolitaine de Toronto, l'Université Queen's, l'Université York et l'Université de la Colombie-Britannique. Vous trouverez copies des procédures ci-jointes.

- 2. Une des parties entend-elle demander la suspension de la demande d'autorisation d'exercer une action collective?**

Les Demandeurs n'entendent pas demander la suspension de leur demande d'autorisation d'exercer une action collective.

- 3. Les parties envisagent-elles de produire des moyens préliminaires avant la présentation de la demande d'autorisation d'exercer une action collective? Si oui, lesquels?**

Nous comptons nous prévaloir pour le compte des Demandeurs du véhicule procédural prévu à l'article 12 du Cpc, afin de réclamer l'anonymat des représentants et des membres de l'action collective. Plus particulièrement, nous comptons demander qu'une ordonnance similaire à celle que vous avez rendue en date du 28 juin 2023 dans *S.N. Miller 2023 QCCS 2333* soit également ordonnée dans le cadre du présent dossier.

Pour sa part, Concordia, dès sa comparution au dossier, a cherché à obtenir la divulgation des noms des demandeurs. Sans cette divulgation, Concordia et CSU sont limitées dans leur capacité à évaluer les critères d'autorisation et à déterminer quels éléments de preuve, y compris une potentielle demande pour interroger le(s) demandeur(s), pourraient être pertinents pour la position qu'elles pourraient prendre à cet égard. Pour cette raison, Concordia et CSU ne sont pas en mesure de prendre position quant aux moyens préliminaires qu'elles pourraient faire valoir relativement à la demande d'autorisation à ce moment-ci. La question de l'anonymat des requérants ainsi que l'établissement des modalités de divulgation de leurs noms aux parties défenderesses doivent être déterminés dans un premier temps.

CSU envisage par contre déjà la présentation d'une demande de précisions et de documents.

Au-delà des moyens préliminaires potentiels, Concordia déposera également une exception déclinatoire visant le rejet partiel de la demande d'autorisation.

Je ne vous demande pas de produire, à cette étape, vos moyens préliminaires, mais simplement de me faire connaître vos intentions. Néanmoins, je tiens pour acquis que vous aurez diligemment commencé la rédaction des moyens préliminaires envisagés, le cas échéant, et que vous serez en mesure de les produire dès le moment déterminé par la ou le juge gestionnaire.

Finalement, je vous rappelle votre obligation de verser toutes vos procédures dès que possible au Registre central des actions collectives du Québec, et ce, conformément à l'article 573 du *Code de procédure civile*, à l'article 56 du *Règlement de la Cour supérieure du Québec en matière civile* et aux *Directives de la Cour supérieure*. Cette obligation s'impose tant aux avocats en demande qu'aux avocats en défense. Quant à ces derniers, il vous incombe notamment de verser dès maintenant votre réponse au Registre et d'y indiquer vos coordonnées.

Vous remerciant à l'avance de l'attention que vous porterez à la présente, je vous prie d'agréer, maîtres, mes salutations distinguées.

Donald Bisson, juge

Cour supérieure du Québec

Coordonnateur de la Chambre des actions collectives - Division de Montréal

Téléphone: 514-393-2161 (IP: 52278)

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Cynthia Declementi

De: Cynthia Declementi
Envoyé: 5 avril 2024 15:10
À: ed@delouyamarkakis.com; tm@delouyamarkakis.com; ae@eidelmannlaw.ca; TommieAnne.Cote@clydeco.ca; Carolena.Gordon@clydeco.ca; mcote@rsslex.com
Cc: Neelin, Elisabeth
Objet: 500-06-001278-239 / Notification – Application for the Disclosure of the Names of the Proposed Representatives to Concordia University’s Attorneys and Representatives (Articles 12, 49 and 99 Code of Civil Procedure) [LANGLOIS-GED_ACTIVE.FID2138002]
Pièces jointes: 2024-04-05 Application for the Disclosure of the Names of the Proposed Representatives to Concordia University’s Attorneys and Representatives(16679459.1).pdf
Importance: Haute

BORDEREAU D’ENVOI

Notification par courriel (Art. 133 et 134 C.p.c.)

Date	5 avril 2024	Heure / Time	<i>Voir l’entête du courriel See email header</i>
Expéditeur / From			
Nom / Name	Elisabeth Neelin	Notre dossier / Our File	342038.0002
Adresse courriel	elisabeth.neelin@langlois.ca	Autre adresse de notification	notificationmtl@langlois.ca
Télécopieur / Fax	514.845.6573	Ligne directe / Direct line	438.844.7803
Destinataire(s) / To			
Nom / Name	Cabinet / Firm	Votre dossier / Your file	Adresse de courriel pour notification / Notification email address
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Nature du document notifié / Nature of the document notified

Numéro de Cour / Court Number	500-06-001278-239
Nom des parties / Name of parties	D.G. and A.L. and L.S. v. Concordia University and Concordia Student Union
Nature du document / Nature of document	Application for the Disclosure of the Names of the Proposed Representatives to Concordia University’s Attorneys and Representatives, Annex A, Notice of Presentation, List of Exhibits and Exhibits CU-1 and CU-2 (Articles 12, 49 and 99 Code of Civil Procedure)

Information relative au document notifié

Format du fichier (PDF, JPEG, WAV, XLS ou autre)	PDF
Taille du document (nombre de pages; d'onglets; de feuilles; durée enregistrement)	16 pages

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vCard

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NO: 500-06-001278-239

**SUPERIOR COURT (Class Action Division)
DISTRICT OF MONTREAL**

D.G.
and
A.L.
and
L.S.

Applicants

v.

CONCORDIA UNIVERSITY
and
CONCORDIA STUDENT UNION

Defendants

**APPLICATION FOR THE DISCLOSURE OF
THE NAMES OF THE PROPOSED
REPRESENTATIVES TO CONCORDIA
UNIVERSITY'S RESPECTIVE ATTORNEYS
AND REPRESENTATIVES, ANNEX A,
NOTICE OF PRESENTATION, LIST OF
EXHIBITS AND EXHIBITS CU-1 AND CU-2
(Article 12 Code of Civil Procedure)**

ORIGINAL



LANGLOIS

AVOCATS - LAWYERS

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CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTREAL

SUPERIOR COURT
(Class Action Division)

NO : 500-06-001278-239

D.G.
and
A.L.
and
L.S.

Applicants

v.

CONCORDIA UNIVERSITY
and
CONCORDIA STUDENT UNION


Defendants

**AFFIDAVIT IN SUPPORT OF THE APPLICATION FOR THE DISCLOSURE OF THE
NAMES OF THE PROPOSED REPRESENTATIVES TO CONCORDIA UNIVERSITY'S
ATTORNEYS AND REPRESENTATIVES**

I, the undersigned, **Elisabeth Neelin**, lawyer, practicing at the law firm LANGLOIS LAWYERS L.L.P. at 1250 René-Lévesque Blvd West, 20th Floor, City and District of Montreal, Province of Quebec, H3B 4W8, solemnly declare that:

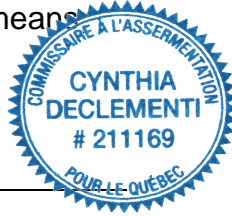
1. I am one of the lawyers acting for **Defendant Concordia University** in the present case;
2. All the facts alleged in this declaration are true.

AND I HAVE SIGNED:



Elisabeth Neelin

Sworn before me by technological means
this April 5, 2024



Cynthia Declementi
Commissioner for oaths for the Quebec

NO : 500-06-001278-239

**SUPERIOR COURT (Class Action Division)
DISTRICT OF MONTREAL**

**D.G.
and
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Applicants

v.

**CONCORDIA UNIVERSITY
and
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Defendants

**AFFIDAVIT IN SUPPORT OF THE
APPLICATION FOR THE DISCLOSURE
OF THE NAMES OF THE PROPOSED
REPRESENTATIVES TO CONCORDIA
UNIVERSITY'S ATTORNEYS AND
REPRESENTATIVES**

ORIGINAL



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