

C A N A D A

CLASS ACTIONS DIVISION
SUPERIOR COURT

PROVINCE OF QUÉBEC
DISTRICT OF MONTREAL
NO: 500-06-001263-231

THE CLASS

and

ASSOCIATION FOR THE RIGHT
OF HOUSEHOLD AND FARM WORKERS

Representative Plaintiff

and

BYRON ALFREDO ACEVEDO TOBAR

Designated Member

v.

ATTORNEY GENERAL OF CANADA

Defendant

**THE DEFENDANT'S POSITION ON THE REPRESENTATIVE PLAINTIFF'S
PARTICULARIZED INITIAL REQUEST FOR THE DISCLOSURE OF DOCUMENTS
DATED DECEMBER 4, 2025, AND ON THE ADDITIONAL REQUEST FOR THE
DISCLOSURE OF DOCUMENTS DATED MARCH 12, 2026**

TO:

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M^{re} Guillaume Charlebois
M^{re} Alexandra Belley-McKinnon
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TAKE NOTICE that the Attorney General of Canada (AGC) objects in part to the *Representative Plaintiff's Particularized Initial Request for the Disclosure of Documents* dated December 4, 2025, and the *Representative Plaintiff's Additional (Post-Defence) Request for the Disclosure of Documents* dated March 12, 2026.

The chart below sets out the position of the AGC for each document request.

Moreover, for each document request:

- The AGC reserves its right to raise applicable objections, privileges and legal immunities that may arise during its review of the documents to be disclosed.
- The disclosure of any document containing personal information will require, prior to its disclosure, an order issued by the Superior Court of Quebec, in accordance with s. 3 and 8 of the *Privacy Act* (R.S.C., 1985, c. P-21). The AGC reserves its right to oppose the issuance of such an order by the Superior Court of Quebec, including by relying on the *Department of Employment and Social Development Act* (S.C. 2005, c.34).
- The AGC also reserves its right to oppose the disclosure of any document containing information protected by s.18 of the *Statistics Act* (R.S.C., 1985, c. S-19).
- The AGC has no obligation to create documents that do not exist, carry out analysis work and/or communicate documents or information that it does not have, including if the documents or information does not exist in the desired format.

Paragraphs of the Representative Plaintiff's <u>Particularized</u> Initial Request for the Disclosure of Documents	Attorney General of Canada's position on the Representative Plaintiff's <u>Particularized</u> Initial Request for the Disclosure of Documents
I. THE SIZE AND COMPOSITION OF THE CLASS¹	
Footnote ¹ : The requests made in this Section remain subject to the outcome of the discussions initiated by the Parties regarding the disclosure of data on the size and composition of the Class and, in particular, whether initial data should be disclosed in the context	(...) <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>

<p>of this request, or whether all data should instead be disclosed in the context of the preparation of the Representative Plaintiff's expert reports. If the data is repeated in several Documents, the Parties should also discuss means of ensuring complete disclosure while avoiding undue duplication.</p>	
<p>2. Any Document containing a calculation or estimation of annual numbers of first-time holders of Closed Work Permits.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>3. Any Document containing a classification of first-time holders of Closed Work Permits by year and by immigration program or stream, nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>4. Any Document containing a calculation or estimation of annual numbers of holders of Closed Work Permits.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>5. Any Document containing a classification of holders of Closed Work Permits by year and by immigration program or stream, nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>

<p>6. Any Document containing a classification of holders of open work permits issued to temporary foreign workers under the International Mobility Program or any previously- existing immigration program or stream, by year and by nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>7. Any Document containing a calculation or estimation of annual numbers of Business Visitors or of annual numbers of first-time Business Visitors.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>8. Any Document containing a classification of Business Visitors by year and by immigration program or stream, nature or field of employment, country of origin, race, national origin, ethnic origin and/or colour.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>9. Any Document containing a calculation or estimation of annual numbers of Domestic Worker of Foreign Representatives or of annual numbers of first-time Domestic Worker of Foreign Representatives.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>10. Any Document containing a classification of Domestic Worker of Foreign Representatives by year and by immigration program or stream, country of origin, race, national origin, ethnic origin and/or colour.</p>	<p>(...)</p> <p><u>Items 2-10 will be subject to an agreement between the parties that is currently being finalized. The AGC has agreed to provide part of the information sought.</u></p>
<p>11. Any Document containing a calculation or estimation of annual numbers of current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign</p>	<p>(...)</p> <p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be</u></p>

Representatives who were notified to leave Canada and/or deported from Canada.	<u>disclosed.</u>
12. Any Document containing a calculation or estimation of annual numbers of current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign Representatives who were assisted by temporary foreign worker recruitment agencies and/or foreign government agents in a process of “voluntary return” to their country of origin before the expiration of their work permit or authorized period of stay in Canada.	(...) <u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u>
II. THE ADMINISTRATIVE CONTEXT	
13. All Policies & Guidelines pertaining to the issuance of Closed Work Permits or otherwise stating the immigration programs or streams for which, or other circumstances in which, Closed Work Permits would be issued.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege.
14. All Policies & Guidelines pertaining to consequences of the termination of the employment of holders of Closed Work Permits.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 37 and 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).
15. All Policies & Guidelines pertaining to Business Visitors.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege.
16. All Policies & Guidelines pertaining to Domestic Workers of Foreign Representatives.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under section 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).
17. All Policies & Guidelines pertaining to the provision of LMIA's or to	The AGC does not object to this request at this stage, subject to privilege and

<p>the appreciation of the conditions to be met or factors to be considered in the provision of an LMIA.²</p>	<p>immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 37 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>Footnote: On September 24, 2024, M^{tre} Belley-McKinnon submitted an access to information request to Employment and Social Development Canada for “[a]ny correspondence, instructions, guideline, procedure, directive or other internal document developed by Employment and Social Development Canada and aimed at expediting the treatment of labour market impact assessment applications from Canadian employers seeking to hire temporary foreign workers.” On or around February 11, 2025, M^{tre} Belley-McKinnon was provided with redacted documents in response to this request, under file number A-2024-01806. As part of the abovementioned request, we request the disclosure of unredacted versions of the documents which were provided to us.</p>	<p>The AGC objects to this request. The pre-trial discovery stage is not an appeal or way to circumvent the access to information process provided in the <i>Access to Information Act</i> (R.S.C., 1985, c. A-1). Access to the unredacted versions of these documents must be requested through the review mechanism provided in this <i>Act</i>.</p> <p>Furthermore, the redactions are justified, including under public interest privilege pursuant to s. 37 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>18. All Memoranda of Understanding concluded between Canada and the government of any country participating in the SAWP, including their annexes and in particular, but without limiting the generality of the foregoing, the standard employment agreements outlining the conditions of employment under the SAWP.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</p>
<p>19. All Policies & Guidelines pertaining to the assessment of the genuineness of an offer of employment made by a Canadian employer to a foreign national in the context of the issuance of a work permit to such foreign national or to the appreciation of the factors to be considered in assessing the genuineness of such an offer.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 37 and s. 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>

<p>20. Any Document containing a calculation or estimation of processing delays for LMIA's.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</p>
<p>21. Any Document containing a calculation or estimation of processing delays for job offer genuineness assessments.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</p>
<p>22. Any Document containing a calculation or estimation of processing delays for applications for Closed Work Permits.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</p>
<p>23. All Policies & Guidelines pertaining to human trafficking risks for current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign Representatives, or to the conduct of human trafficking investigations involving them as victims.</p>	<p>(...)</p> <p><u>The AGC denies any involvement, direct or indirect, in human trafficking activities, and the communication of the requested documents, if any, is made without prejudice to this position.</u></p> <p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 37 and 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>
<p>24. All Policies & Guidelines pertaining to the removal or deportation of current or former holders of Closed Work Permits, Business Visitors, or Domestic Workers of Foreign Representatives.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including privileges under s. 37 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>III. THE DESIGNATED MEMBER</p>	
<p>25. All Documents provided by or on behalf of the Designated Member to the Government of Canada between 2014 and 2022, including the Designated Member's applications for work permits, the Designated Member's application for</p>	<p>The AGC does not object to this request at this stage, subject to obtaining the written consent of the Designated Member or an order from the Superior Court of Quebec, in accordance with s. 3 and 8 of the <i>Privacy Act</i> (R.S.C., 1985, c.</p>

<p>permanent residence and Documents submitted in support thereof or in connection therewith.</p>	<p>P-21).</p>
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IV. THE HISTORICAL DEVELOPMENT OF THE PROGRAMS

<p><u>26. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases discussing or otherwise pertaining to:</u></p> <p><u>(a) the [...] undesirability of non-white immigration or immigration from Non-Preferred Countries of Origin (including Jamaica and the Caribbean countries);</u></p> <p><u>(b) the inability of non-white immigrants or immigrants from Non-Preferred Countries of Origin to assimilate to life in Canada;</u></p> <p><u>(c) the unsuitability of non-white immigrants or immigrants from Non-Preferred Countries of Origin to conditions in Canada; or</u></p> <p><u>(d) risks posed by non-white immigration or immigration from Non-Preferred Countries of Origin in Canada.</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. <u>It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p> <p>The documents requested may also be subject to privileges and immunities, including privileges under s. 37 and s. 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
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<p><u>27. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases discussing or</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. <u>It is therefore susceptible to varying interpretations and would be</u></p>
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<p>otherwise pertaining to the actual or potential temporary migration into Canada of non-white migrants or migrants from <u>Non-Preferred Countries of Origin</u> (including Jamaica and the Caribbean countries) on Closed Work Permits or other forms of employer-specific work authorizations.</p>	<p><u>unenforceable if ordered by this Court.</u></p> <p>The documents requested may also be subject to privileges and immunities, including privileges under s. 37 and 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>28. <u>[...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases discussing or otherwise pertaining to the actual or potential issuance of Closed Work Permits or other forms of employer-specific work authorizations to white migrants or migrants from [...] the United States of America, the United Kingdom, New Zealand, Australia or a European country;</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>(...)</p> <p>The documents requested may also be subject to privileges and immunities, including privileges under s. 37 and 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>29. <u>[...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases pertaining to the opportunity or inopportunity or to the risks or benefits of the West Indian Domestic Scheme, or of the employer-specific work requirements under same, including proposals to ministers or to Cabinet in respect of the establishment, development, or termination of the scheme.</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the documents requested may be subject to privileges and immunities, including privileges under s. 37 and 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>30. <u>[...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate,</p>

<p><u>papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases pertaining to the opportunity or inopportunity or to the risks or benefits of the SAWP, of expanding the SAWP by adding participating countries, or of the Closed Work Permits issued under the SAWP, including proposals to ministers or to Cabinet in respect of the establishment, development or expansion of the SAWP.</u></p>	<p>and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the documents requested may be subject to privileges and immunities, including privileges under s. 37 and s. 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>31. <u>[...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases between 1945 and 1982 and in all cases pertaining to the opportunity or inopportunity or to the risks or benefits of expanding the applicability of Closed Work Permits in Canada to other immigration programs or streams than the SAWP, including proposals to ministers or to Cabinet in respect of the establishment or development of the NIEAP, TFWP, or any other immigration programs or streams leading to the issuance of Closed Work Permits.</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the documents requested may be subject to privileges and immunities, including privileges under s. 37 and s. 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>V. AWARENESS OF THE HARMFUL IMPACTS OF EMPLOYER-TYING MEASURES BY THE DEFENDANT</p>	
<p>32. <u>[...] All complaints, denunciations or submissions received by the Government of Canada since 1966 regarding:</u></p> <p>(a) the restricted capacity of current or</p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the request is not framed in</p>

former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives to resign or change employers in Canada;

(b) the power imbalance between such migrant workers and their employers in Canada;

(c) the vulnerability of such migrant workers to exploitation, abuse or human and labour rights violations, or exploitation, abuse or human and labour rights violations suffered by such migrant workers, including but not limited to:

- i) financial abuses (predatory loans, wage theft, non-payment of wages, late payment of wages, underpayment of wages, illegal deductions or fees);
- ii) employer control over movements or over social interactions;
- iii) unsafe working conditions, such as hazardous tasks, exposure to physical or chemical hazards, exposure to extreme weather, lack of personal protective equipment, exposure to faulty or broken equipment or machinery, inadequate training, unsafe transportation methods, unsustainable productivity targets, excessive working hours, and insufficient breaks and periods of rest;
- iv) work-related accidents, injuries, illnesses or death;
- v) experiencing poor living

objective terms and invites a subjective interpretation of documents. It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.

The documents requested may also be subject to privileges and immunities, including solicitor-client privilege, informer privilege, and privileges under s. 37 and s. 38 of the *Canada Evidence Act* (R.S.C., 1985, c. C-5).

<p><u>conditions, including inadequate, unsanitary, overcrowded or poorly-maintained accommodation, inadequate nutrition, lack of access to clean drinking water, lack of access to sanitation facilities, sleep deprivation, and lack of privacy;</u></p> <p>vi) <u>experiencing discrimination, intimidation or psychological harassment;</u></p> <p>vii) <u>physical violence or assault;</u></p> <p>viii) <u>sexual harassment, sexual assault or rape;</u></p> <p>ix) <u>chronic fatigue, stress and mental health issues, including depression and anxiety disorders;</u></p> <p>x) <u>substance use disorders;</u></p> <p>xi) <u>experiencing situations of illegal or undocumented work or of irregular status; and</u></p> <p>xii) <u>becoming a victim of human trafficking, debt bondage, or other forms of modern slavery; or</u></p> <p><u>(d) other negative consequences for such migrant workers of their restricted capacity to resign or change employers in Canada, including but not limited to:</u></p> <p>i) <u>a loss of access (or delay in access) to health coverage;</u></p> <p>ii) <u>a loss of access (or delay in access) to permanent legal status;</u></p>	
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<ul style="list-style-type: none"> iii) <u>a loss of access (or delay in access) to legal status for family members;</u> iv) <u>deportation risks upon termination of their employment;</u> v) <u>a restricted freedom of movement;</u> vi) <u>a restricted access to social interactions or social isolation;</u> vii) <u>a restricted access to potential assistance, including community networks and support networks such as legal clinics or unions;</u> viii) <u>a restricted access to health and social services;</u> ix) <u>a restricted access to health and social benefit programs or deprivation of the benefits of these programs;</u> x) <u>a restricted capacity to assert their legal rights and to seek redress for the violation of such rights through administrative or judicial processes.</u> 	
<p>33. All Documents generated, issued or received by or exchanged within the Government of Canada since 1966 [...] discussing [...] <u>the exposure of current or former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives [...] to any of the consequences described above in paragraphs 32(a), 32(b), 32(c) or 32(d) hereof or the fact that such migrant workers suffer(ed) any of such</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. <u>It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p>

<p><u>consequences.</u></p>	<p>The documents requested may also be subject to privileges and immunities, including solicitor-client privilege, investigative privilege, informer privilege, as well as privileges under s. 37, s. 38 and s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p><u>33.1. Incident reports, investigation reports, inspection reports, evaluation reports, or inspection services evaluation reports generated, issued or received by or exchanged within the Government of Canada since 1966 in respect of instances of exploitation, abuse, human or labour rights violations (including those listed in paragraph 32(c) above) or other negative consequences (including those listed in paragraph 32(d) above) suffered by current or former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives.</u></p>	<p><u>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</u></p> <p><u>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p> <p><u>The documents requested may also be subject to privileges and immunities, including solicitor-client privilege, investigative privilege, informer privilege, as well as privileges under s. 37, s. 38 and s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>
<p><u>33.2. Incident reports, investigation reports, inspection reports, evaluation reports, or inspection services evaluation reports generated, issued or received by or exchanged within the Government of Canada since 1982 in respect of failures by employers of holders of Closed Work Permits to comply with LMIA conditions.</u></p>	<p><u>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</u></p> <p><u>The documents requested may also be subject to privileges and immunities, including solicitor-client privilege, investigative privilege, informer privilege, as well as privileges under s. 37, s. 38 and s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>
<p><u>34. [...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p>

<p><u>correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases since 1966 and in all cases discussing proposed changes to the Act, to the Regulations, to Policies & Guidelines or to immigration programs or streams as a result of [...] the exposure of current or former holders of Closed Work Permits, Business Visitors or Domestic Workers of Foreign Representatives to any of the consequences described above in paragraphs 32(a), 32(b), 32(c) or 32(d) hereof, whether or not such proposed changes were implemented.</u></p>	<p>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. <u>It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p> <p>The documents requested may also be subject to privileges and immunities, including solicitor-client privilege, and privileges under s. 37, s. 38 and 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>35. Independent study commissioned by Employment and Social Development Canada in August 2018 as part of its ongoing review of the Agricultural stream of the TFWP to assess current housing standards and provide recommendations for how to develop national requirements for workers' housing.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</p>
<p>36. <u>[...] All complaints, denunciations or submissions received by the Government of Canada regarding (a) the downward pressure on working conditions in Canada arising from Canadian employers' reliance on Closed Work Permits; (b) the existence of an incentive for Canadian employers to replace Canadian citizen or permanent resident workers by holders of Closed Work Permits; or (c) obstacles created by Closed Work Permits to holding abusive employers accountable.</u></p>	<p>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</p> <p>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. <u>It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p> <p>The documents requested may also be subject to privileges and immunities, including privileges under s. 37 and s. 38 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>37. All Documents generated, issued or received by or exchanged within the Government of Canada [...] discussing</p>	<p>The AGC objects to this request. The request is not framed in objective terms and invites a subjective interpretation of</p>

<p><u>[...] any of the subjects described above in paragraphs 36(a), 36(b) or 36(c) hereof.</u></p>	<p>documents. <u>It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p> <p>The documents requested may also be subject to privileges and immunities, including solicitor-client privilege and privileges under s. 37 and s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>38. <u>[...] All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases discussing proposed changes to the Act, to the Regulations, to Policies & Guidelines or to immigration programs or streams as a result of Canadian employers' reliance on Closed Work Permits or the impact of their reliance on Canadian workers, permanent residents and/or the Canadian labour market, or as a result of [...] any of the subjects described above in paragraphs 36(a), 36(b) or 36(c) hereof, whether or not such proposed changes were implemented.</u></p>	<p>The AGC objects to this request. The request is not framed in objective terms and invites a subjective interpretation of documents. <u>It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p> <p>The documents requested may also be subject to privileges and immunities, including under s. 37 and s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
<p>VI. PARLIAMENTARY AND U.N. SPECIAL RAPPORTEUR REPORTS³</p>	
<p>Footnote: Some of the Documents sought in this section have already been made public by the House of Commons or Senate of Canada. The requests made in this section are made for completeness purposes only, and are to be discussed by the Parties.</p>	
<p>39. Any evidence or submissions presented by the Government of Canada</p>	<p>The AGC does not object to this request at this stage, subject to privilege and</p>

<p>to CIMM in the context of the work which led to the CIMM 2009 Report.</p>	<p>immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>40. Any response of the Government of Canada to the CIMM 2009 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the CIMM 2009 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>41. Any evidence or submissions presented by the Government of Canada to HUMA in the context of the work which led to the HUMA 2016 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>42. Any response of the Government of Canada to the HUMA 2016 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the HUMA 2016 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>

	<p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>43. Any evidence or submissions presented by the Government of Canada to CIMM in the context of the work which led to the CIMM 2021 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>44. Any response of the Government of Canada to the CIMM 2021 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the CIMM 2021 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>45. Any evidence or submissions presented by the Government of Canada to CIMM in the context of the work which led to the CIMM 2024 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>

<p>46. Any response of the Government of Canada to the CIMM 2024 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the CIMM 2024 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>47. Any evidence or submissions presented by the Government of Canada to SOCI in the context of the work which led to the SOCI 2024 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>48. Any response of the Government of Canada to the SOCI 2024 Report and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the SOCI 2024 Report.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
<p>49. Any evidence or submissions presented by the Government of Canada to the U.N. Special Rapporteur in the</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be</p>

<p>context of the work which led to the U.N. Special Rapporteur Reports.</p>	<p>disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
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<p>50. Any response of the Government of Canada to the U.N. Special Rapporteur Reports and any Documents discussing or otherwise pertaining to the elaboration of this response and/or the implementation of the recommendations of the U.N. Special Rapporteur Reports.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p>This position is also without prejudice to the position of the AGC on the admissibility into evidence of these documents, including but not limited to, parliamentary privilege.</p>
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VII. OPEN WORK PERMITS FOR VULNERABLE WORKERS

<p>51. All Documents, including any policy analysis, discussing or otherwise pertaining to the proposed creation of open work permits for vulnerable workers, including all Documents containing the “thorough analysis of the advantages and disadvantages associated with employer-specific work permits” undertaken by the Government of Canada, mentioned in the regulatory impact analysis statement communicated as Exhibit P-14.</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 37 and 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p>
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<p>52. All Documents containing comments received in respect of the proposed Regulations Amending the Immigration and Refugee Protection Regulations republished in the Canada Gazette, Part I, on December 15, 2018,</p>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 37 and s. 39 of the <i>Canada Evidence Act</i> (R.S.C.,</p>
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whether in writing or in the context of consultations.	1985, c. C-5).
53. All Policies & Guidelines pertaining to the issuance of open work permits for vulnerable workers.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including privileges under s. 37, s. 38, and s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).
54. Any Document containing a calculation or estimation of annual numbers of applications for open work permits for vulnerable workers received and/or of annual numbers of such applications that were granted, dismissed, or which were not processed to their conclusion.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).
55. Any Document containing a calculation or estimation of processing delays for applications for open work permits for vulnerable workers.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.
56. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness of open work permits for vulnerable workers.	The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).

ADDITIONAL (POST-DEFENCE) REQUEST FOR THE DISCLOSURE OF DOCUMENTS

57. <u>All Policies & Guidelines included in the “policies, procedures and guidelines” referred to at paragraph 42 of the Defence and not otherwise included in the Initial Request or in the present request, if any.</u>	<p>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under s. 37 and 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</p> <p><u>Documents responsive to this request will be provided under the document requests of Section II (Administrative Context) of the Particularized Initial Request for the Disclosure of Documents.</u></p>
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<p><u>58. Any Document assessing the length of Business Visitors' stay in Canada or the nature of their activities in Canada, otherwise than on an individual basis.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u></p>
<p><u>59. Any Document evidencing decisions made by the Government of Canada in the purported exercise of a royal prerogative over international or foreign affairs and pertaining to the establishment of the DWAP or to the evolution of its terms, including the obligations imposed on Domestic Workers of Foreign Representatives.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under sections 38 and 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>
<p><u>60. All (a) Policies & Guidelines; (b) memoranda, instructions, discussion papers, briefing, research or policy papers, reports, analyses, or written correspondence sent or received by an Executive Official or Employee; or (c) minutes or notes of meetings or verbal exchanges involving an Executive Official or Employee, in all cases pertaining to the opportunity or inopportunity or to the risks or benefits of the DWAP, of the obligation for Domestic Workers of Foreign Representatives to live in the foreign representative's household, of the prohibition from working for more than one employer at a time, or of the requirement of the express consent of the Office of Protocol to employer transfers, including proposals to ministers or to Cabinet in respect of the modification of the DWAP or such obligation, prohibition or requirement.</u></p>	<p><u>Documents responsive to request 60(a) will be provided under the document requests of Section II (Administrative Context) of the Particularized Initial Request for the Disclosure of Documents.</u></p> <p><u>The AGC objects to requests 60(b) and (c). It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</u></p> <p><u>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court</u></p> <p><u>The documents requested may also be subject to privileges and immunities, including privileges under sections 37, 38 and 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>
<p><u>61. All Policies & Guidelines pertaining to the issuance of the Office of Protocol's consent to employer transfers by Domestic Workers of Foreign Representatives.</u></p>	<p><u>Documents responsive to this request will be provided under the document requests of Section II (Administrative Context) of the <i>Particularized Initial Request for the Disclosure of</i></u></p>

	<u>Documents.</u>
<u>62. Any Document containing a calculation or estimation of annual numbers of applications received for the Office of Protocol's consent to employer transfers by Domestic Workers of Foreign Representatives and/or of annual numbers of such applications that were granted, dismissed, or which were not processed to their conclusion.</u>	<u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u>
<u>63. Any Document containing a calculation or estimation of processing delays for applications for the Office of Protocol's consent to employer transfers by Domestic Workers of Foreign Representatives.</u>	<u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u>
<u>64. All Policies & Guidelines pertaining to changes of employers by holders of Closed Work Permits and to the issuance of new work permits to such holders in such context within Canada, including but not limited to the <i>Changing Employers Temporary Public Policy</i> referred to at paragraph 124 of the <i>Defence</i>.</u>	<u>Documents responsive to this request will be provided under the document requests of Section II (Administrative Context) of the <i>Particularized Initial Request for the Disclosure of Documents</i>.</u>
<u>65. Any Document containing a calculation or estimation of annual numbers of applications for new work permits received from holders of Closed Work Permits seeking to change employers within Canada and/or of annual numbers of such applications that were granted, dismissed, or which were not processed to their conclusion.</u>	<u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u>
<u>66. Any Document containing a calculation or estimation of processing delays for applications for new work permits received from holders of Closed Work Permits seeking to change employers within Canada.</u>	<u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u>

<p><u>67. All Policies & Guidelines pertaining to the inspections referred to at paragraph 181 of the Defence (“Inspections”) or to the imposition of the administrative monetary penalties or other consequences or enforcement action referred to at paragraph 183 of the Defence (collectively, “Measures”).</u></p>	<p><u>Documents responsive to this request will be provided under the document requests of Section II (Administrative Context) of the <i>Particularized Initial Request for the Disclosure of Documents</i>.</u></p>
<p><u>68. Any Document containing a calculation or estimation of annual numbers of Inspections performed by the Government of Canada.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u></p>
<p><u>69. Any Document containing a calculation or estimation of annual numbers of each type of Measure imposed by the Government of Canada.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u></p>
<p><u>70. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness, efficiency or costs of Inspections and Measures to deter non-compliance with the regulatory conditions referred to at paragraphs 181 to 183 of the Defence.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under section 38 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>
<p><u>71. All Policies & Guidelines pertaining to the confidential tip line and online reporting tool referred to at paragraph 185 of the Defence.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under sections 37, 38 and 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>
<p><u>72. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness, efficiency or costs of the confidential tip line and online reporting tool referred to at paragraph 185 of the Defence.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed, including solicitor-client privilege and privileges under section 39 of the <i>Canada Evidence Act</i> (R.S.C., 1985, c. C-5).</u></p>

<p><u>73. All Policies & Guidelines pertaining to the Migrant Worker Support Program referred to at paragraph 186 of the Defence.</u></p>	<p><u>Documents responsive to this request will be provided under the document requests of Section II (Administrative Context) of the Particularized Initial Request for the Disclosure of Documents.</u></p>
<p><u>74. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the effectiveness, efficiency or costs of the Migrant Worker Support Program referred to at paragraph 186 of the Defence.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u></p>
<p><u>75. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the feasibility or effects of issuing open work permits to migrant workers instead of Closed Work Permits, including but not limited to the effects alleged at paragraphs 194 to 197 and 201 of the Defence.</u></p>	<p><u>The AGC does not object to this request at this stage, subject to privilege and immunity review of the documents to be disclosed.</u></p>
<p><u>76. All Documents generated, issued or received by or exchanged within the Government of Canada containing an assessment of or otherwise pertaining to the feasibility or effects of alternatives to the admission of migrant workers under Closed Work Permits other than the issuance of open work permits, including but not limited to immigration selection and permanent status recognition programs, and reliance on government or non-profit organizations as official sponsors.</u></p>	<p><u>The AGC objects to this request. It is abusive, overly broad, disproportionate, and would in effect transform this class action into a commission of inquiry.</u></p> <p><u>Furthermore, the request is not framed in objective terms and invites a subjective interpretation of documents. It is therefore susceptible to varying interpretations and would be unenforceable if ordered by this Court.</u></p> <p><u>The documents requested may also be subject to privileges and immunities, including privileges under sections 37, 38 and 39 of the Canada Evidence Act (R.S.C., 1985, c. C-5).</u></p>

MONTREAL, May 29, 2026

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**SUPERIOR COURT
(Class Action Division)
District of Montreal**

THE CLASS

and
**ASSOCIATION FOR THE RIGHTS OF HOUSEHOLD AND
FARM WORKERS**

Representative Plaintiff

and
BYRON ALFREDO ACEVEDO TOBAR

Designated Member

v.
ATTORNEY GENERAL OF CANADA

Defendant

**THE DEFENDANT'S POSITION ON THE REPRESENTATIVE
PLAINTIFF'S PARTICULARIZED INITIAL REQUEST AND
THE ADDITIONAL POST-DEFENCE REQUEST FOR
THE DISCLOSURE OF DOCUMENTS**

ORIGINAL

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