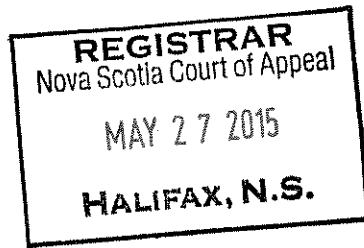


2015



C.A. No. 4388⁹54

NOVA SCOTIA COURT OF APPEAL

BETWEEN:

THE NOVA SCOTIA BARRISTERS' SOCIETY

APPELLANT

- and -

TRINITY WESTERN UNIVERSITY and BRAYDEN VOLKENANT

RESPONDENTS

**JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS
ASSOCIATION FOR REFORMED POLITICAL ACTION
EVANGELICAL FELLOWSHIP OF CANADA
CHRISTIAN HIGHER EDUCATION CANADA
ATTORNEY GENERAL OF CANADA
CATHOLIC CIVIL RIGHTS LEAGUE
FAITH AND FREEDOM ALLIANCE
CHRISTIAN LEGAL FOUNDATION
CANADIAN COUNCIL OF CHRISTIAN CHARITIES
NOVA SCOTIA HUMAN RIGHTS COMMISSION**

INTERVENORS IN THE COURT BELOW

Notice of Motion

TO: The Nova Scotia Barristers' Society, Appellant
AND TO: Trinity Western University and Brayden Volkenant, Respondents
AND TO: The Intervenors in the Court Below

Motion for Leave to Intervene

The proposed Intervenor, the Canadian Bar Association (the "CBA"), respectfully requests an order pursuant to *Civil Procedure Rule* 90.19 that:

1. the CBA may intervene in the within appeal;

2. the CBA be permitted to present oral arguments at the hearing of the appeal;
3. the CBA will not be held liable for the costs of any other party or intervenor; and
4. such other terms and conditions as deemed appropriate by this Honourable Court.

Grounds

The CBA submits that it has an interest in the appeal and further that the submissions the CBA proposes to advance:

- (a) are relevant to the appeal;
- (b) will be useful to the Court of Appeal;
- (c) will be different from those of the parties;
- (d) will not cause prejudice to the parties;
- (e) will not cause undue delay to the proceeding; and
- (e) such other grounds as outlined in the CBA's Memorandum of Argument, dated May 27, 2015 and filed with this Notice of Motion for Leave to Intervene.

Time and Place

The Motion is to be heard by a Judge of the Court of Appeal at a time and date to be determined, at the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The CBA says that the Motion will not require more time.

References

The CBA relies on the following legislation, rules, or points of law:

- (a) *Civil Procedure Rule* 90.19; and
- (b) Legislation and points of law contained in the Memorandum of Argument, dated May 27, 2015, and filed with this Motion.

Evidence

The evidence in support of this Motion is as follows:

- (a) Affidavit of Michele Hollins, sworn May 25, 2015, filed with this Motion;
- (b) Such further evidence as may be provided, as permitted by this Honourable Appeal Court.

Possible order against you

You may file an affidavit and a brief, attend the hearing of the motion, and state your position on whether the proposed order should be made. If you do not attend, the Judge may grant an order without further notice to you.

Contact Information

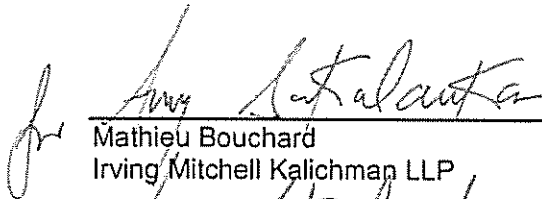
The CBA designates the following address:

Mathieu Bouchard, Amy Sakalauskas & Susan Ursel
c/o Irving Mitchell Kalichman LLP
3500 De Maisonneuve Boulevard West
Suite 1400
Montreal (Quebec) H3Z 3C1


Documents delivered to this address will be considered received by the CBA on delivery. Further contact information is available to each party through the Prothonotary.

Signature


Signed this 27th day of May 2015.



Mathieu Bouchard
Irving Mitchell Kalichman LLP



Amy Sakalauskas
Barrister & Solicitor



Susan Ursel
Ursel Phillips Fellows Hopkinson LLP

Counsel for the Moving Party/Proposed Intervenor, the
Canadian Bar Association