

**IN THE ONTARIO COURT OF APPEAL
(ON APPEAL FROM THE DIVISIONAL COURT)**

B E T W E E N:

TRINITY WESTERN UNIVERSITY and BRAYDEN VOLKENANAT

Applicants
(Appellants in Appeal)

- and -

THE LAW SOCIETY OF UPPER CANADA

Respondent
(Respondent in Appeal)

NOTICE OF MOTION

The Moving Party will make a motion to the Associate Chief Justice on 11 December 2015 at 10:00 AM or as soon after that time as the motion can be heard, at 130 Queen Street West, Toronto.

PROPOSED METHOD OF HEARING: The motion is to be heard

in writing under subrule 37.12.1(1) because it is unopposed.

in writing as an opposed motion under subrule 37.12.1(4)

orally.

THE MOTION IS FOR

a) Leave to intervene as a friend of the court in the hearing of this appeal.

THE GROUNDS FOR THE MOTION ARE:

a) Rules 1.04, 13, and 37 of the *Rules of Civil Procedure*;

b) That the matter is in the public interest;

c) That the issues involved include the balancing of the rights of the parties and upholding the rule of law;

d) That Canada's obligations under international law, and international sources of jurisprudence in respect of those obligations, are relevant issues in determining the appeal;

- e) That Lawyers' Rights Watch Canada is in a position to make unique and useful contributions in respect of international jurisprudence that will assist the Court in the resolution of the appeal without doing an injustice to the parties;
- f) That the motion is unopposed; and
- g) Such further and other grounds as counsel may advise and this honourable court may deem just.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- a) The pleadings, and evidence from the Court below, filed;
- b) The affidavit of Paul D. Copeland with supporting exhibits;
- c) The moving party's Factum; and
- d) Such further and other evidence as counsel may advise and this honourable Court may deem just.

24 November 2015

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TRINITY WESTERN UNIVERSITY and
BRAYDEN VOLKENANAT
Appellants

and

THE LAW SOCIETY OF UPPER
CANADA
Respondent

Court of Appeal Number: C61116
Divisional Court File No.: 250/14

**ONTARIO
COURT OF APPEAL**

Proceeding commenced at **TORONTO**

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