

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E N:

UNIVERSITY OF WATERLOO

Plaintiff

- and -

**JOHN DOE, JANE DOE, PERSONS UNKNOWN, AHMAD KAMAL, RACHEL
THEVENARD, JACOB PRIES, NICHOLAS SARWEH, SARAH AHMED,
CHRISTINA VANALSTYNE, AND JOHN-LEE BANNISTER**

Defendants

NOTICE OF MOTION

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NOTICE OF MOTION

The Plaintiff, University of Waterloo ("**Waterloo**" or the "**University**"), will make a motion to a judge on a date to be fixed by this Court at 85 Frederick St, Kitchener, ON N2H 0A7.

PROPOSED METHOD OF HEARING: The motion is to be heard orally.

THE MOTION IS FOR:

1. An Order abridging the time for service of this Notice of Motion and supporting materials, to the time of actual service, and directing that the Motion is properly returnable at the date and time scheduled for this motion if necessary;

2. An Order under Rule 37.07(2) of the *Rules of Civil Procedure* dispensing with service of this Notice of Motion and Motion Record on John Doe, Jane Doe, and Persons Unknown;
3. An Order validating service of the Notice of Motion, or an alternative to personal service, on Ahmad Kamal, Rachel Thevenard, Jacob Pries, Nicholas Sarweh, Sarah Ahmed, Christina Vanalstyne, and John-Lee Bannister;
4. An Order declaring that the Defendants, their agents, associates, affiliates, or anyone acting on their behalf, who have established an encampment on the green space next to the Graduate House on the University of Waterloo main Campus in Waterloo, Ontario (the "**Encampment**"), have unlawfully and illegally constructed the Encampment on private University property, thereby engaging in trespass and creating a safety hazard, a nuisance, and a disruption of the University's legitimate business;
5. An order empowering the Plaintiff or its designate to:
 - a. Dismantle the Encampment, including, but not limited to, removing any tents, shelters, structures, fences, barriers, barricades, personal chattels, or rubbish of any kind whatsoever, located on the green space next to the Graduate House of the Plaintiff's main Waterloo Campus grounds located at 200 University Avenue West (the "**Campus**"); and
 - b. Retain, store, or dispose of any Encampment materials at the Plaintiff's discretion;

6. An interlocutory injunction ordering that the Defendants, their agents, associates, affiliates, or anyone acting on their behalf:
 - a. No later than 24 hours after the issuance of an Order, vacate the green space next to the Graduate House on the Campus and permit the Plaintiff to have full use and enjoyment of its Campus;
 - b. Refrain from re-building any such fence or obstruction that obstructs or restricts access to any part of the Campus;
 - c. Cease, desist, and refrain from trespassing at the University, including by conducting any other unauthorized occupation or obstruction of the private property owned by the University;
 - d. Refrain from camping on or occupying in any manner whatsoever, including without limitation by fencing, barricading, blocking or otherwise obstructing or hindering, in whole or in part, the Campus;
 - e. Refrain from using, entering, or gathering at the green space next to the Graduate House without the written consent and authorization of the University between the hours of 10 p.m. and 8 a.m.;
 - f. Refrain from disturbing, interrupting, or attempting to disturb or interrupt the operations of the University in Waterloo, Ontario;
 - g. Refrain from intimidating or attempting to intimidate or unlawfully threatening any students, faculty, or staff, or other persons passing through the Campus;

- h. Refrain from interfering with the University's Senate, Board of Governors, all teaching and research activities and events related to University operations, and/or any other regularly scheduled meeting on Campus or elsewhere in any way; and
 - i. Refrain from gathering for the purpose an Encampment or in any manner inconsistent with the University's policies;
- 7. An Order that the Defendants, their agents, associates, affiliates, anyone acting on their behalf or any other person having notice of this Order, be restrained from ordering, aiding, abetting, counselling, or encouraging in any manner whatsoever, either directly or indirectly, any person to commit the acts set out above;
- 8. An Order that this Order shall remain in effect until the trial of the action is concluded, or until further Order of this Court, whichever first occurs;
- 9. An Order directing the Waterloo Regional Police Service, or the appropriate police authority in the jurisdiction in question (the "**Police**") to arrest and remove persons, objects, and structures who/which violate the terms of the Order;
- 10. An Order setting out the manner of service of this Order; and
- 11. Such further and other relief as counsel may advise and this Honourable Court deems just.

THE GROUNDS FOR THE MOTION ARE:

The Parties

12. The University of Waterloo is a public research university incorporated under the *University of Waterloo Act*. The main campus of Waterloo is located at 200 University Avenue West and occupies about 1000 acres, including over 100 buildings and six faculties in uptown Waterloo, Ontario. Waterloo also operates three satellite campuses and has four affiliated university colleges across Southwestern Ontario. The University has about 42,000 full and part-time students enrolled each year and about 11,500 active employees, including faculty, staff, and temporary and student employees;
13. The University is an autonomous academic institution, and thus not subject to the *Canadian Charter of Rights and Freedoms*;
14. The Defendants are members of an unauthorized and unlawful Encampment (as defined below) on the University Campus who have refused to dismantle the Encampment after receiving a Trespass Notice to end the Encampment;
15. John Doe, Jane Doe, and Persons Unknown represent people who have occupied or are currently occupying the green space next to the Graduate House on Campus as part of the Encampment;
16. The individual Defendants, Ahmad Kamal, Rachel Thevenard, Jacob Pries, Nicholas Sarweh, Sarah Ahmed, Christina Vanalstyne, and John-Lee Bannister, are all individuals who have publicly identified as participating in the Encampment and/or having a leadership role in the Encampment:

- a. Ahmad Kamal is a student at the University, claimed “admin liaison”, a member of the Encampment and a representative of the unauthorized and unlawful Encampment and the “uw4liberation” group;
 - b. Rachel Thevenard, a former student at the University, and Jacob Pries are members of the Encampment and claimed “police liaisons”;
 - c. Nicholas Sarweh, is a student at the University, member of the Encampment, a claimed “media liaison” for the Encampment, and is also associated with the Voices of Palestine and the OccupyUWaterloo Instagram pages;
 - d. Sarah Ahmed is a student at the University, a member of the Encampment, a claimed “admin liaison,” and is also associated with the OccupyUWaterloo Instagram page;
 - e. Christina Vanalstyne is a member of the Encampment and is associated with the OccupyUWaterloo Instagram page;
 - f. John-Lee Bannister is a member of the Encampment and is a student from Wilfrid Laurier University;
17. Some or all of John Doe, Jane Doe, Persons Unknown and the named Defendants are associated with the OccupyUWaterloo social media page, which has been communicating to the public on behalf of the Encampment;
 18. On its Instagram page, OccupyUWaterloo has made three main demands of the University:

- a. Disclose to students the full list of the University’s investments and financial and academic ties;
 - b. Divest from all companies on the Boycott, Divestment, and Sanctions (BDS) list and from all defence contractors and weapons manufacturers; and
 - c. An academic and cultural boycott of all institutional ties to Israeli companies, goods, and universities at the University and on its premises;
19. Among other similar accounts, including uw4liberation, OccupyUWaterloo promotes on Instagram that the Encampment is located at the “Gaza House”, which they are referring to as the green space next to the Graduate House on Campus, and have publicly stated “Your intimidation tactics don't work. We are not interested in talking about anything but our demands. [...] Disclose and divest, we will not stop, we will not rest!”

The University Supports Free Speech on Campus

20. The University’s core mission is to advance learning and knowledge through teaching, research, and scholarship, nationally and internationally, in an environment of free expression and inquiry. The University strives to balance this mission with other fundamental values and legal obligations, including its duty to provide a safe environment, free from discrimination and harassment to its students, faculty, and staff;
21. The University permits and supports lawful expressions of free speech and peaceful assembly on its Campus. In its Policy 8 – Freedom of Speech policy, the University has expressed its commitment to providing an environment in which community

members and visitors may engage in free speech without undue interference. This policy rightfully excludes, from the definition of free speech, any breaches of Canadian law, any breaches of the University's policies, and speech that constitutes undue interference with another individual's or group's ability to engage in free speech;

22. The Freedom of Speech policy complements other University policies, including policies related to the use of the University's facilities, ethical behaviour, student discipline, and staff employment;
23. Since October 7, 2023, the University has witnessed various on-Campus political events, discussions, and protests involving pro-Palestinian, pro-Israeli, or other advocates. In response, the University supported students, faculty, staff, and community members to express their concerns and beliefs, provided it was safe and legal. The University also implemented several precautionary measures to enhance the security of these events, including deploying a small team of its Special Constables and liaising with the Police to monitor and secure events;
24. The University has also observed several demonstrations on Campus facilitated by various pro-Palestinian groups;
25. In establishing the Encampment and related demonstrations and occupations, the Defendants have not complied with the applicable University policies and procedures governing protests or use of the Campus;
26. Freedom of speech and freedom of association for all members of the University community has been limited by the Encampment;

The Occupants are Trespassing on University Property

27. Beginning on May 13, 2024, the Defendants set up tents on the green space next to the Graduate House on the Waterloo main Campus for the express purpose of coercing the University to meet its demands (the “**Encampment**”);
28. The total area of the Encampment measures about 23,700 square feet;
29. Without the University’s authorization, the Defendants have attempted to publicly “rename” the area of the Encampment as “Gaza House”;
30. The members of the Encampment do not have the University’s authorization to occupy the green space next to the Graduate House on Campus. Still, they continuously occupy the Encampment overnight in tents and others attend demonstrations during the daytime;
31. Occupants have taken control of, and blocked access to, the Encampment property and have prevented the University from accessing and exercising control over its own property;
32. The leadership of the Encampment, including Ahmad Kamal, Rachel Thevenard, Jacob Pries, Nicholas Sarweh, Sarah Ahmed, Christina Vanalstyne, and John-Lee Bannister continue to authorize, permit, and acquiesce in the continuous unlawful occupation of private University property;
33. Due to the Encampment, the green space next to the Graduate House has not been available to any other members of the University community or the public;

34. Occupants of the Encampment also moved several University-owned Adirondack chairs from their original locations around Campus into the Encampment for their sole use and have refused to return the chairs when requested;
35. The occupants have reinforced the unlawful Encampment. On May 18, 2024, occupants erected wooden barriers around the Encampment, blocking access into the Encampment and obstructing access to and from various throughways at the University;
36. The Encampment has continued to expand, posing health, safety, and security risks for students, staff, and the public by blocking access to, from and through the University Campus, and even blocking the University from accessing its own facilities;
37. On May 20, 2024, the University issued a formal communication to the members of the Encampment to end the Encampment and remove all structures and alerting the members of the Encampment of their violation of University policies and the *Trespass to Property Act*, R.S.O. 1990, c. T. 21. The occupants refused to comply with the University's Notice;
38. On June 15, 2024, the University issued another formal communication to members of the Encampment and the broader University community, notifying the occupants that their continued occupation of University private property continued to breach the University's policies and constituted unlawful trespass. The Encampment representatives did not formally respond but placed posters around Campus that same day stating, "We Will Not Stop" and "We Will Not Rest";

39. Members of the Encampment have continued to insist that the Encampment is “indefinite” and have refused to dismantle, move, or make any modifications to the size, scale, or operations of the Encampment unless the University capitulates to their demands;
40. On June 21, 2024, the University issued a Trespass Notice to all Encampment participants, prohibiting the continued occupation of the green space next to the Graduate House and notifying the occupants that continuing to participate in prohibited activities at the University would require the University to pursue consequences under the University policies, and/or agreements and the law;
41. On June 21, 2024, the University also sent a formal communication to the University community explaining that the Trespass Notice stated that the occupants must leave the green space next to the Graduate House and must not return the Encampment to University property;
42. Later that day, the Defendant, Ahmad Kamal, wrote on the Trespass Notice that was posted on the wall of the Encampment: “Again, I ain’t reading all that. Free Palestine”. OccupyUWaterloo posted an image of the Trespass Notice with the writing, with a caption that read in part “ [w]e will not give way to complicity, hypocrisy and outright lies. Until liberation and return. From the river to the sea, Palestine will be free! ”;
43. Participants of the Encampment have refused to comply with the Trespass Notice, which is a criminal offence;

44. Right before the University issued the Trespass Notice, the Waterloo Regional Police Service informed the University that it will not enforce the University's Trespass Notice to clear the Encampment without an Order of this Court;

Dialogue with the Occupants Has Failed

45. The University has attempted to bring an end to the Encampment through repeated discussions with liaisons and representatives from the Encampment on an almost daily basis, including Ahmad Kamal, but those occupants have insisted that the University meet their demands or else the Encampment will not end;
46. On May 29, 2024, the occupants finally agreed to a formal meeting with the University senior administration. The University senior administration hosted a formal meeting with four Encampment representatives to attempt to find a resolution. No agreement was reached but the parties agreed to resume discussions. The occupants hosted a demonstration that same day, which was attended by about 300 people;
47. The University has extended invitations to the occupants to have further discussions. While the occupants initially displayed interest in a second meeting, when the time came for a subsequent meeting, members of the Encampment, and specifically Ahmad Kamal, effectively refused to proceed, by swearing at members of the University administration and then conditioning any subsequent meetings on further demands;
48. On June 15, 2024, the University issued a formal communication to members of the Encampment notifying the occupants of their continued violation of the Universities' policies and stating that the University desired to productively discuss the occupants' concerns, reach an amicable conclusion to the Encampment and continue productive

and respectful dialogue. The Encampment did not issue a formal response and posted posters around Campus that same day that stated, “We Will Not Stop” and “We Will Not Rest”;

49. Representatives of the Encampment have demonstrated that they are unwilling to engage in respectful and productive dialogue with the University. They have made it clear that the occupants will not stop until the University capitulates to their demands;

The Encampment Has Caused Irreparable Harm to the University

50. The occupants have acted unlawfully by depriving the University of access to and control of its own property, among other things. Thus, the University has suffered irreparable harm because of the occupants’ unlawful behaviour;
51. In addition to the loss of access to and control over its own property, the University has suffered and continues to suffer other forms of irreparable harm;
52. The Encampment and related activities raise health and safety concerns for the members of the Encampment, other member of the University community, and the public:
 - a. Members of the Encampment have refused the University’s requests for a safety tour of the Encampment to ensure that health and safety regulations are followed, including maintaining accessible entry and exit points, the proper use of the University electrical outlets used by the Encampment, and the removal of all fire hazards;

- b. The wooden barriers around the Encampment block an established fire exit from the Graduate House, causing an increased safety risk in the event of a fire and making egress from the building challenging;
 - c. The wooden barriers around the Encampment are supported by sharp wooden stakes protruding from the ground, creating tripping hazards; and
 - d. Between May 25, 2024, and May 26, 2024, occupants climbed to the roof of the University's Physics building to hang a banner that read "Sufyan Taya Hall – Honour our Martyrs";
53. The occupants have engaged in property damage, as well as disruptive and intimidating conduct. They have done so with the aim of impeding the University's ability to carry out its normal operations and tarnishing the University's reputation and goodwill in the community:
- a. On May 25, 2024, the occupants erected a large poster of the University President & Vice-Chancellor on a free-standing frame adjacent to the wall of the Graduate House that had the words "Genocide Goel" repeated multiple times. In erecting this poster, the occupants have caused the University reputational harm;
 - b. On May 27, 2024, the occupants organized a demonstration to interfere with the UWaterloo Day celebration and hung the "Genocide Goel" banner from a railing inside the Davis Centre at the University. In publicly hanging this banner, the occupants have caused the University reputational harm;

- c. On June 1, 2024, the occupants again posted the banner with the image of the President & Vice-Chancellor of the University defaced with the words “Genocide Goel” in and around the Encampment. Later that day, they disrupted the University of Waterloo, Faculty of Engineering Alumni Dinner by displaying the defaced image of the President & Vice-Chancellor while yelling into a megaphone, chanting, and scattering flyers onto attendees from an upper floor;
- d. On June 3, 2024, occupants interrupted the flag raising ceremony to launch Pride Month on Campus by chanting, honking horns, and yelling that the President & Vice-Chancellor had blood on his hands, which entirely halted the ceremony. The occupants refused to stop their disruptions unless the President & Vice-Chancellor refrained from speaking during the entire event;
- e. On June 10, 2024, the occupants organized a demonstration outside of Needles Hall where a Senate meeting was taking place, which was attended by about 75 people, including students from Wilfrid Laurier University. The occupants distributed an “op-ed newsletter” which read “UWaterloo & Laurier Students Escalate for Gaza! Join Now!”, among other things;
- f. On June 12, 2024, the occupants hung posters around Campus showing the images of the President & Vice-Chancellor and the Vice-President, Research & International "Wanted for Complicity in Genocide". The poster included the words "Genocide Goel" and "Inhumane Charmaine". These images were also reflected in flyers distributed during a demonstration attended by about 50

people outside of the University's Convocation tents. The occupants' misconduct has caused the University reputational harm;

- g. On June 13, 2024, the occupants defaced a University statue with graffiti reading "Free Palestine" and "UW is Complicit Free Palestine";
- h. On the same day, June 13, 2024, the Defendant, Ahmad Kamal, had an outburst during one of the University's attempted discussions with the representatives of the Encampment, which put an abrupt end to all dialogue. The University attempted to notify the Encampment that the posters of the President & Vice-Chancellor and the Vice-President, Research & International "Wanted for Complicity in Genocide" violated University policies (in particular, Policy 33 – Ethical Behaviour), to which the Defendant Ahmad Kamal replied, "Fuck politeness!";
- i. On June 18, 2024, before a scheduled Board of Governor's meeting in Needles Hall, occupants stormed a University facility and took over the area, physically preventing University staff and members of the Board of Governors from accessing their offices or the Senate/Board of Governors meeting room for the meeting. The occupants chanted "Disclose! Divest! We will not stop we will not rest!", among other things, and formed a human chain which trapped individuals attending the Board of Governors meeting in and around the Senate/Board meeting room. The University had to cancel the Board of Governors meeting and call in the Waterloo Regional Police Service for assistance with maintaining security on Campus;

- j. On June 19, 2024, an occupant placed a letter under the door of the President & Vice-Chancellor's office addressed to "Genocide Goel". The letter refers to the President & Vice-Chancellor as a "fucking racist" and states "[y]ou will have no peace until you contribute your fair share of justice to the People of Palestine". The letter concludes "Not yours truly, For your hands are red with blood.";
- k. On or about June 24, 2024, the occupants placed stickers with derogatory comments on the doors outside the President & Vice-Chancellor and the Provost's offices. One sticker referenced the June 19, 2024, letter and read "remember the letter". Other stickers stated "Our protest will continue until you DIVEST, BOYCOTT" and "DIVEST. BOYCOTT. CONDEMN GENOCIDE. STOP BEING RACIST BASTARDS";
- l. Because of the occupants' misconduct and unlawful behaviour, the University has had to implement enhanced security at Needles Hall to continue its normal operations;

The University Has Met the Test for an Injunction

- 54. The Defendants have no lawful right to occupy the Campus. The continued presence of the Encampment violates the *Trespass to Property Act*, R.S.O. 1990, c. T. 21.;
- 55. The ongoing Encampment and associated misconduct by the occupants have raised both a serious issue to be tried and a strong *prima facie* case in trespass, ejectment, civil conspiracy, and intimidation;

56. While the University's ongoing loss of access to and control over its private property is sufficient to establish irreparable harm, the University also continues to suffer irreparable harm in the form of health and safety risks, property damage, and reputational damage;
57. The balance of convenience favours granting the University of Waterloo an injunction;
58. While the *Charter* does not apply to the University, it has still taken great care to carve out a safe space for free speech on Campus since the events of October 7, 2023. The Orders sought by the University will not interfere with the occupants' ability to express their opinions and engage in respectful and vigorous discussion and debate. The commission of torts or criminal offences is not a protected form of expression;
59. The University has provided an undertaking with respect to damages;
60. Sections 101 and 141 of the *Courts of Justice Act*, R.S.O. 1990 c. C.43, as amended;
61. Rules 2.03, 37.17, 40.01 and 40.02 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 1994, as amended;
62. The *Criminal Code of Canada*, R.S.C. 1985, c. C-46, as amended;
63. The *Trespass to Property Act*, R.S.O. 1990, c. T.21;
64. The *Occupational Health and Safety Act*, R.S.O, 1990, c. O.1;
65. The *Fire Prevention and Protection Act*, 1997, S.O. 1997, c. 4; and
66. Such further and other grounds as counsel may advise and this Honourable Court may permit.

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

67. the Affidavit of Christopher Read, to be sworn;
68. the Affidavit of Kate Windsor, to be sworn; and
69. the Affidavit of Jon Mason, to be sworn;
70. the Affidavit of Jacinda Reitsma, to be sworn; and
71. such further and other evidence as counsel may advise and this Honourable Court may permit.

June 25, 2024

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Plaintiff

-and-

JOHN DOE, et al.
Defendant

Court File No.: CV-24-00001052-0000

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