

IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE COURT OF APPEAL FOR QUEBEC)

BETWEEN:

ATTORNEY GENERAL OF QUEBEC

APPELLANT
(Appellant/Incidental Respondent)

and

BIJOU CIBUABUA KANYINDA

RESPONDENT
(Respondent/Incidental Appellant)

and

COMMISSION DES DROITS DE LA PERSONNE ET DES DROITS DE LA JEUNESSE

RESPONDENT
(Mise en cause / Incidental Appellant)

and

WOMEN'S LEGAL EDUCATION AND ACTION FUND INC.

Intervener

- and -

Style of Cause Continued on Next Page

FACTUM OF THE INTERVENER
WOMEN'S LEGAL EDUCATION AND ACTION FUND INC.

(Rules 37 and 42 of the *Rules of the Supreme Court of Canada*, SOR/2002-156, as amended)

M^e Olga Redko
M^e Vanessa Ntaganda
IMK LLP / s.e.n.c.r.l.
1400 – 3500 Blvd. de Maisonneuve W.
Montréal, Québec H3Z 3C1
Tel: (514) 934-7742
Fax: (514) 935-2999
Email: oredko@imk.ca

Counsel for the Intervener, Women's Legal Education and Action Fund Inc.

ATTORNEY GENERAL OF CANADA, ATTORNEY GENERAL OF ONTARIO,
ATTORNEY OF BRITISH COLUMBIA, ATTORNEY GENERAL OF ALBERTA,
CANADIAN CONSTITUTION FOUNDATION, ADVOCATES FOR THE RULE OF LAW,
REFUGEE CENTRE, CENTRALE DES SYNDICATS DU QUÉBEC, BLACK ACTION
DEFENSE COMMITTEE, AMNESTIE INTERNATIONALE CANADA FRANCOPHONE,
FCJ REFUGEE CENTRE AND MADHU VERMA MIGRANT JUSTICE CENTRE,
CANADIAN ASSOCIATION OF REFUGEE LAWYERS, CHARTER COMMITTEE ON
POVERTY ISSUES, NATIONAL ASSOCIATION OF WOMEN AND THE LAW AND
DAVID ASPER CENTRE FOR CONSTITUTIONAL RIGHTS, INCOME SECURITY
ADVOCACY CENTRE, UNITED NATIONS HIGH COMMISSIONER FOR REFUGEES,
BRITISH COLUMBIA CIVIL LIBERTIES ASSOCIATION, CANADIAN COUNCIL FOR
REFUGEES, CANADIAN CIVIL LIBERTIES ASSOCIATION, ESCR-NET –
INTERNATIONAL NETWORK FOR ECONOMIC, SOCIAL AND CULTURAL RIGHTS,
CANADIAN ASSOCIATION OF BLACK LAWYERS AND BLACK LEGAL ACTION
CENTRE, ASSOCIATION QUÉBÉCOISE DES AVOCATS ET AVOCATES EN DROIT
DE L'IMMIGRATION

Interveniers

ORIGINAL TO: Registrar
Supreme Court of Canada
301 Wellington Street
Ottawa, ON K10 1J0

COPY TO:

Bernard, Roy (Justice-Québec)
8.00 – 1 Notre-Dame Street East
Montréal, QC H2Y 1B6

M^e Manuel Klein
M^e Luc-Vincent Gendron-Bouchard
Tel : 514 393-2336 Ext. 51560
Tel : 514 393-2336 Ext. 51996
Fax : 514 873-7074
Email : manuel.klein@justice.gouv.qc.ca
luc-vincent.gendron-bouchard@justice.gouv.qc.ca

Ministère De La Justice
4e étage 1200, route de l'Église
Québec, QC G1V 4X1

M^e Christophe Achdjian
M^e Amélie Pelletier Desrosier
Tel: 418 643-1477 Ext. 20732
Tel: 418 643-1477 Ext. 21006
Email: christophe.achdjian@justice.gouv.qc.ca
amelie.pelletier-desrosiers@justice.gouv.qc.ca

**Counsel for the Appellant,
Attorney General of Québec**

MMGC
300 – 1717 René-Lévesque Blvd East
Montréal, QC H2L 4T3

M^e Sibel Ataogul
M^e Guillaume Grenier
Tel: 514 525-3414
Fax: 514 525-2803
Email: sataogul@mmgc.quebec
ggrenier@mmgc.quebec

**Counsel for the Respondent,
Bijou Cibuabua Kanyinda**

Noël et Associés
225 Montée Paiement
Gatineau, QC J8P 6M7

M^e Pierre Landry
Tel: 819 771-7393
Fax: 819 771-5397
Email: p.landry@noelassocies.com

**Agent for the Appellant,
Attorney General of Québec**

Bitzakidis Clément-Major Fournier
2nd Floor – 360 Saint-Jacques Street
Montréal, QC H2Y 1P5

M^e Christine Campbell
M^e Justine St-Jacques
Tel: 514 873-5146 Ext. 8384
Fax: 514 873-6032
Email: christine.campbell@cdpdj.qc.ca
justine.st-jacques@cdpdj.qc.ca

Counsel for the Respondent,
Commission des droits de la personne et des
droits de la jeunesse

Alberta Justice Constitutional and
Aboriginal Law
10th Floor – 10025-102A Avenue N.W.
Edmonton, AB T5J 2Z2

Me Leah M. McDaniel
Tel: 780 422-7145
Fax: 780 643-0852
Email: leah.mcdaniel@gov.ab.ca

Counsel for the Intervener,
Attorney General of Alberta

Attorney General of Ontario
4th Floor– 720 Bay Street
Montréal, QC M7A 2S9

Me Rochelle Fox
Me Maia Stevenson
Tel: 416 995-3288
Fax: 416 326-4015
Email: rochelle.fox@ontario.ca
maia.stevenson@ontario.ca

Counsel for the Intervener,
Attorney General of Ontario

Attorney General of British Columbia
PO Box 9280 – Stn Prov Govt
Victoria, BC V8W 9J7

Gowlings WLG (Canada) LLP
2600 – 160 Elgin Street
Ottawa, ON K1P 1C3

Me D. Lynne Watt
Tel: 613 786-8695
Fax: 613 788-3509
Email: lynne.watt@gowlingwlg.com

Agent for the Intervener,
Attorney General of Alberta

Supreme Advocacy LLP
100 – 340 Gilmour Street
Ottawa, ON K2P 0R3

Me Marie-France Major
Tel: 613 695-8855
Fax: 613 695-8580
Email: mfmajor@supremeadvocacy.ca

Agent for the Intervener,
Attorney General of Ontario

Michael Sobkin Law Corporation
331 Somerset Street West
Ottawa, ON K2P 0J8

Me Ashley A. Caron
Tel: 778 974-3342
Fax: 250 356-9454
Email: ashley.caron@gov.bc.ca

**Counsel for the Intervener,
Attorney General of British Columbia**

Attorney General of Canada
5th Floor - 200 René-Lévesque Blvd West
Montréal, QC H2Z 1X4

M^e François Joyal
M^e Justine Malone
M^e Lindy Rouillard-Labbé
Tel: 514 283-4934
Fax: 514 496-7876
Email: francois.joyal@justice.gc.ca
justine.malone@justice.gc.ca
lindy.rouillard-labbe@justice.gc.ca

**Counsel for the Intervener,
Attorney General of Canada**

**Fasken Martineau Dumoulin s.e.n.c.r.l.,
s.r.l.**
800 rue du Square-Victoria, Bureau 3500
Montréal, QC H4Z 1E9

M^e Guillaume Pelegrin
M^e Jean-François Trudelle
Tel: 514 397-7411
Fax: 514 397-7600
Email: gpelegrin@fasken.com
jtrudelle@fasken.com

**Counsel for the Intervener,
Canadian Constitution Foundation**

Jordan Honickman Barristers
90 Adelaide St W, Suite 200
Toronto, ON M5H 3V9

Asher Honickman
Chelsea Dobrindt

Me Michael Sobkin
Tel: 613 282-1712
Fax: 613 228-2896
Email: msobkin@sympatico.ca

**Agent for the Intervener,
Attorney General of British Columbia**

Department of Justice Canada
National Litigation Sector
275 Sparks Street, St-Andrew Tower
Ottawa, ON K1A 0H8

M^e Bernard Letarte
Tel: 613 294-6588
Email: sccagentcorrespondantcsc@justice.gc.ca

**Agent for the Intervener,
Attorney General of Canada**

Tel: 416 238-7511
Fax: 514 238-5261
Email: ahonickman@jhbarristers.com
cdobrindt@jhbarristers.com

**Counsel for the Intervener,
Advocates for the Rule of Law**

The Refuge Centre / Le Centre des Réfugiés
100-2107 rue Sainte-Catherine Ouest
Montréal, QC H3H 1M6

M^e Pierre-Luc Bouchard
M^e Brett Gordon Howie
Tel: 514 846-0005
Fax: 514 600-1688
Email: p.bouchard@therefugeecentre.org

**Counsel for the Intervener,
Refugee Centre**

Les Services Juridiques de la CSQ
9405, rue Sherbrooke Est
Montréal, QC H1L 6P3

M^e Amy Nguyen
M^e Ariane Roberge
Tel: 514 356-8888 Ext : 2137
Fax: 514 356-0990
Email: nguyen.amy@lacsq.org
roberge.ariane@lacsq.org

**Counsel for the Intervener,
Centrale des Syndicats du Québec**

Sotos LLP
55 University Avenue, Suite 600
Toronto, ON M5J 2H7

Mohsen Seddigh
Tel: 416 977-0007
Fax: 416 977-0717
Email: mseddigh@sotosllp.com

**Counsel for the Intervener,
Black Action Defense Committee**

Supreme Advocacy LLP
100 – 340 Gilmour Street
Ottawa, ON K2P 0R3

Me Marie-France Major
Tel: 613 695-8855
Fax: 613 695-8580
Email: mfmajor@supremeadvocacy.ca

**Agent for the Intervener,
Centrale des Syndicats du Québec**

MMGC

300-1717, boul. René-Lévesque Est
Montréal, Quebec H2L 4T3

M^e Julien Thibault

Tel: 514 525-3414

Fax: 514 525-2803

Email: jthibault@mmgc.quebec

**Counsel for the Intervener,
Amnistie internationale Canada
francophone**

University of Ottawa**Faculty of Law**

57 Louis-Pasteur Pvt.

Ottawa, ON K1N 6N5

M^e Yin Yuan Chen

Tel: 613 562-5800 Ext: 2077

Email: yy.chen@uottawa.ca

FCJ Refugee Centre

208 Oakwood Avenue

Toronto, ON M6E 2V4

M^e Joshua Eisen

Tel: 416 469-9754 ext. 261

Fax: 416 469-2670

Email: joshuae@fcjrefugeecentre.org

**Counsel for the Intervener,
FCJ Refugee Centre and Madhu Verma
Migrant Justice Centre**

McCarthy Tétrault LLP

745 Thurlow Street, Suite 2400

Vancouver, BC V6E 0C5

M^e Connor Bildfell**M^e Simon Bouthillier****M^e Katherine Griffin**

Tel: 604 643-7100

Fax: 604 643-7900

Email: cbildfell@mccarthy.ca

sbouthillier@mccarthy.ca

**Counsel for the Intervener,
Canadian Association of Refugee Lawyers**

Pink Larkin

201 - 1463 South Park St
Halifax, Nova Scotia B3J 3S9

M^e Vince Calderhead

Tel: 902 423-7777

Fax: 902 423-9588

Email: vcaldерhead@pinklarkin.ca

Faculty of Law, University of Ottawa

57 Louis Pasteur
Ottawa, ON K1N 6N5

M^e Martha Jackman

Email: martha.jackman@uottawa.ca

**Counsel for the Intervener,
Charter Committee on Poverty Issues**

University of New Brunswick

41 Dineen Drive, Rm 204A
Fredericton, NB E3B 9V7

M^e Kerri Froc

Tel: 416 977-6070

Email: kerri.froc@unb.ca

**National Association of Women and the
Law**

1404 Scott Street
Ottawa, ON K1Y 2N2

M^e Suzanne Zaccour

Tel: 613 241-7570

Email: suzanne.zaccour@nawl.ca

**David Asper Centre for Constitutional
Rights**

University of Toronto Faculty of Law
78 Queen's Park Crescent E,

Toronto, ON M5S 2C3

M^e Cheryl Milne

Tel: 416 978-0092

Email: cheryl.milne@utoronto.ca

**Counsel for the Intervener,
National Association of Women and the
Law and David Asper Centre for
Constitutional Rights**

Income Security Advocacy Centre

1500-55 University Avenue

Toronto, ON M5J 2H7

M^e Robin Nobleman

M^e Adrian Merdzan

Tel: 416 597-5820

Fax: 416 597-5821

Email: robin.nobleman@isac.clcj.ca

**Counsel for the Intervener,
Income Security Advocacy Centre**

Borden Ladner Gervais LLP

1000 rue de la Gauchetière O bureau 900

Montréal, QC H3B 5H4

M^e François Grondin

M^e Karine Fahmy

M^e Amanda Afeich

Tel: 514 954-3153

Fax: 514 954-1905

Email: fgrondin@blg.com

kfahmy@blg.com

aafeich@blg.com

**Counsel for the Intervener,
United Nations High Commissioner for
Refugees**

Norton Rose Fulbright Canada LLP

1500-45 O'Connor St

Ottawa, ON K1P 1A4

M^e Jean-Simon Schoenholz

Tel: 613 780-1537

Fax: 613 230-5459

Email: jean-simon.schoenholz@nortonrosefulbright.com

**Agent for the Intervener,
National Association of Women and the
Law and David Asper Centre for
Constitutional Rights**

Supreme Advocacy LLP

100 – 340 Gilmour Street

Ottawa, ON K2P 0R3

M^e Marie-France Major

Tel: 613 695-8855 Ext :102

Fax: 613 695-8580

Email: mfmajor@supremeadvocacy.ca

**Agent for the Intervener,
Income Security Advocacy Centre**

Borden Ladner Gervais LLP

100 Queen Street, suite 1300

Ottawa, ON K1P 1J9

Nadia Effendi

Tel: 613 787-3562

Fax: 613 230-8842

Email: neffendi@blg.com

**Agent for the Intervener,
United Nations High Commissioner for
Refugees**

Paliare Roland Rosenberg Rothstein LLP
35th Floor - 155 Wellington St W.
Toronto, ON M5V 3H1

M^e Mannu Chowdhury
M^e Kartiga Thavaraj
Tel: 416 646-6302
Fax: 416 367-6749
Email: mannu.chowdhury@paliareroland.com
Kartiga.thavaraj@paliareroland.com

**Counsel for the Intervener,
British Columbia Civil Liberties
Association**

Colin Grey
Barrister & Solicitor
128 Union Street
Kingston, ON K7L 2P1

M^e Colin Grey
Tel: 416 859-9446
Fax: 514 439-0798
Email: colin.grey@queensu.ca

Hadekel Shams s.e.n.c.r.l.
6560 de l'Esplanade Avenue, Suite 305
Montréal, QC H2V 4L5

M^e Peter Shams
Tel: 514 439-0800
Fax: 514 439-0798
Email: peter@hadekelshams.ca

**Counsel for the Intervener,
Canadian Council for Refugees**

Trudel Johnston & Lespérance
750, côte de la Place-d'Armes, suite 90
Montréal, QC H2Y 2X8

M^e Alexandra (Lex) Gill
M^e Bruce W. Johnston

Conway Baxter Wilson LLP
411 Roosevelt Avenue, suite 400
Ottawa, ON K2A 3X9

Me David P. Taylor
Tel: 613 780-2026
Fax: 613 688-0271
Email: dtaylor@conwaylitigation.ca

**Agent for the Intervener,
British Columbia Civil Liberties
Association**

Tel: 514 871-8385 Ext: 219
Fax: 514 871-8800
Email: lex@tjl.quebec
bruce@tjl.quebec

**Counsel for the Intervener,
Canadian Civil Liberties Association**

Olthuis Van Ert
66 Lisgar St
Ottawa, ON K2P 0C1

M^e Neil Abraham
M^e Gib van Ert
Tel: 613 501-5350
Fax: 613 651-0304
Email: nabraham@ovcounsel.com
gvanert@ovcounsel.com

**Counsel for the Intervener,
ESCR-Net - International Network for
Economic, Social and Cultural Rights**

McCarthy Tétrault LLP
MZ400 - 1000 De La Gauchetière Street West
Montréal, QC H3B 0A2

M^e Karine Joizil
M^e Sajeda Hedaraly
M^e Natasha Petrof
Tel: 514 397-4129
Fax: 514 875-6246
Email: kjoizil@mccarthy.ca
shedaraly@mccarthy.ca
npetrof@mccarthy.ca

IMK LLP
3500 De Maisonneuve Blvd. West, Suite 1400
Montréal, QC H3Z 3C1

M^e Bianca Annie Marcelin
M^e Marianne Goyette
Tel: 514 934-7726
Tel: 438 601-3271
Fax: 514 935-2999
Email: bamarcelin@imk.ca

mgoyette@imk.ca

**Counsel for the Intervener,
Canadian Association of Black Lawyers
and Black Legal Action Centre**

Hasa Avocats Inc.

2000 Ave McGill College, Suite 600, bureau
682

Montréal, QC H3A 3H3

M^e Lawrence David

M^e Gjergji Hasa

Tel: 514 849-7311

Fax: (514) 849-7313

Email: l.david@havocats.ca

g.hasa@havocats.ca

**Counsel for the Intervener,
Association québécoise des avocats et
avocates en droit de l'immigration**

TABLE OF CONTENTS

PARTS I & II: OVERVIEW, STATEMENT OF POSITION, AND FACTS	1
PART III: STATEMENT OF ARGUMENT.....	2
A. <i>Overlap Between the Two Steps of the s. 15(1) Test is Often Inevitable in Adverse Impact Discrimination Claims</i>	2
B. <i>Remedial Legislation Must Abide by the Same Animating Norm of Substantive Equality</i> ..	6
PART IV & V: COSTS AND ORDER SOUGHT	10
PART VI: TABLE OF AUTHORITIES.....	11

PARTS I & II: OVERVIEW, STATEMENT OF POSITION, AND FACTS

A. Overview and Statement of Position

1. Can a statutory benefit intended to improve the circumstances of a protected group legally exclude the most marginalized members of that group from its ambit? This appeal asks whether s. 3 of the *Reduced Contribution Regulation*¹ (“**Regulation**”), which excludes asylum seekers (including those with work permits) from accessing subsidized childcare in Quebec, infringes s. 15(1) of the *Canadian Charter of Rights and Freedoms* (“**Charter**”). In this context, the appeal raises key questions about the implementation of the s. 15(1) analytical framework. The Women’s Legal Education and Action Fund (“**LEAF**”) intervenes to make two submissions.

2. First, the two parts of the s. 15(1) test are not and should not be treated as watertight compartments. In cases where an adverse impact discrimination claim is advanced, a certain degree of overlap between both steps is not only expected but necessary to fully account for the claimant group’s experience. In particular, consideration of intersecting sources of pre-existing disadvantage that shape a claimant’s experience, such as the disproportionate burden of childcare responsibilities that women bear, is necessary to appreciate the full impact of the impugned provision and thus to determine if the provision has an adverse impact.

3. Second, remedial legislation, such as the *Regulation*, must abide by the same substantive equality standard animating s. 15(1) as any other type of legislation. When governments enact legislation that confers a social benefit, they have a constitutional obligation to ensure that it does not leave behind the most vulnerable among the legislation’s targeted population. At the second step of the s. 15(1) test, the focus must be on the effect of the impugned legislation on the claimant group, considering all the group’s characteristics and circumstances. The remedial intent of the legislation may be relevant to a s. 1 justification analysis, but it cannot bear on whether the impugned provision is discriminatory.

B. Facts

4. LEAF takes no position on the facts of the case.

¹ [CQLR, c S-4.1.1, r 1.](#)

PART III: STATEMENT OF ARGUMENT

A. *Overlap Between the Two Steps of the s. 15(1) Test is Often Inevitable in Adverse Impact Discrimination Claims*

5. It is uncontroversial that at the first stage of the s. 15(1) analysis, the process of establishing a distinction based on a provision's adverse effects on a claimant group must take **all** of a claimant's circumstances into consideration.² This requires courts to inquire how disadvantage affecting some but not all members of the claimant group can be caused by intersecting sources of marginalization.³ This may result in impugned legislation having a qualitatively different impact on those members of the group. But it is equally incontestable today that a distinction can exist even if impugned legislation only affects *some* members of a claimant group.⁴

6. In other words, accounting for "all context relevant to the claim at hand"⁵ at the first stage of s. 15(1) requires courts to consider evidence about how intersecting sources of inequality *within and across* recognized categories of discrimination operate to create unique disadvantages for some members of the claimant group, and how the impugned provision in turn creates differential impact connected to those disadvantages for those members.⁶

7. Examining the specific circumstances of the claimant, including any existing or historical sources of disadvantage they face, can result in a certain degree of overlap between the elements of proof that are relevant to establishing the presence of an effects-based distinction, and those that are relevant to determining whether the distinction is discriminatory. This is because "the same facts that illustrate a distinction may also illustrate [that distinction's] discriminatory character."⁷

² *R. v. Sharma*, [2022 SCC 39](#), at para. 192 per Karakatsanis J. [*Sharma*]; *Fraser v. Canada (Attorney General)*, [2020 SCC 28](#), at paras. 56-57 [*Fraser*].

³ *Sharma*, at para. 196, per Karakatsanis J. citing *Withler v. Canada (Attorney General)*, [2011 SCC 12](#), at para. 58 [*Withler*].

⁴ *Fraser* at paras. 74-75; *Quebec (Attorney General) v. A.*, [2013 SCC 5](#), at para. 354 [*Quebec v. A.*]; *Nova Scotia (Workers' Compensation Board) v. Martin*, [2003 SCC 54](#), at para. 76; Jonnette Watson Hamilton and Jennifer Koshan, "Adverse Impact: The Supreme Court's Approach to Adverse Effects Discrimination under [Section 15](#) of the [Charter](#)" (2015), 19 Rev. Const. Stud. 191, at pp. 197-198 [*Watson Hamilton and Koshan*].

⁵ *Withler*, at para. 58, at para. 43.

⁶ *Egan v. Canada*, [1995 CanLII 98 \(SCC\)](#), [1995] 2 SCR 513, at para. 53 per L'Heureux Dubé J. [*Egan*].

⁷ *Sharma*, at para. 194 (Karakatsanis J. dissenting but citing the majority judgment in *Law v. Canada (Minister of Employment and Immigration)*, [1999 CanLII 675 \(SCC\)](#), [1999] 1 SCR 497,

Far from being problematic, such overlap is necessary for a full appreciation of a claimant group's circumstances, allowing courts to understand the qualitative impact of the impugned legislation and thus whether that legislation in fact adversely affects the claimant group.

8. This is what the Court of Appeal did in the present case by focusing on contextual factors – i.e., women's historic pre-existing disadvantage in relation to childcare responsibilities – at each stage of the s. 15(1) test.⁸ In so doing, the Court of Appeal did not misconstrue the two steps of the analysis.⁹ To the contrary: considering the pre-existing disadvantage suffered by certain members of the claimant group at the first step of the test is the only approach that respects s. 15's focus on substantive equality in assessing differential impact.

9. This focus on substantive equality was emphasized by this Court as early as in *Andrews*, where McIntyre J. observed that s. 15 of the *Charter* was designed to address the deficiencies of jurisprudence under the *Canadian Bill of Rights*'¹⁰ formal conception of equality.¹¹ Prior to the adoption of the *Charter*, for instance, this Court upheld the denial of unemployment insurance benefits to pregnant women on the basis that it was not inappropriate for Parliament to have adopted provisions that singled out pregnant women for disadvantageous treatment relative to non-pregnant women or men. The Court reasoned that any inequality between the sexes in access to such statutory benefits was “not created by legislation but by nature”¹² and therefore did not violate the *Bill of Rights*' guarantee of equality before the law. Under the *Bill of Rights*, the impact of a protected group's existing circumstances was simply not seen as relevant to assessing the effect of impugned legislation. This was, of course, deeply problematic.

10. The enactment of s. 15, and its judicial interpretation, were intended to put that formalistic notion of equality to rest. This deliberate shift was underscored by the inclusion of the right to “equal benefit of the law” under s. 15(1) and further reinforced through the adoption of a substantive understanding of equality that not only permits but *requires* courts to consider a law's

at para. 85 [**Law**]; *Fraser*, at para. 82; see also Colleen Sheppard, *Inclusive Equality: The Relational Dimensions of Systemic Discrimination in Canada* (Montréal: McGill-Queen's University Press, 2010) at p. 21.

⁸ *Procureur général du Québec v. Kanyinda*, [2024 QCCA 144](#), at paras. 89-100; see also: *Fraser*, at paras. 101-105.

⁹ See Appellant's factum, at paras. 70 and 126 and following.

¹⁰ [SC 1960, c. 44](#).

¹¹ See *Andrews*, v. *Law Society of British Columbia*, [1989 CanLII 2 \(SCC\)](#), [1989] 1 SCR 143, at p. 170 (emphasis added) (McIntyre J.) [**Andrews**].

¹² *Bliss v. Attorney General of Canada*, [1978 CanLII 25 \(SCC\)](#), [1979] 1 SCR 183, at p. 190.

“impact upon those to whom it applies, and also upon those whom it excludes from its application.”¹³

11. As the “animating norm”¹⁴ of the s. 15(1) framework, substantive equality informs both stages of the test. Thus, at the first stage of the analysis in a claim of adverse effects discrimination, courts must ascertain the nature of the impugned law’s impact on the claimant group, including subgroup members.¹⁵ This “can usually only be fully appreciated through a broad, contextual analysis”¹⁶ that considers *all* of that group’s circumstances.¹⁷ In particular, a court must take account of the fact “that membership in the claimant group is associated with certain characteristics that have disadvantaged members of the group.”¹⁸

12. Importantly, a claimant’s characteristics should not each be considered separately; instead, they should be treated as an interwoven, complex context in which the claimant is situated. Here, the Appellant isolates each of the Respondent’s characteristics – her sex, her immigration status, and her citizenship – to argue that a distinction cannot be established based on any single one of these grounds independently.¹⁹ This approach risks failing to account for a claimant’s real experience²⁰ and may obscure the qualitatively different impact of the *Regulation* on subgroup members.

13. Specifically, such an approach fails to assess the reality of claimants whose personal circumstances are composed of “intersecting sources of inequality”²¹ such as sex, family or parental status,²² gender, race, religion, age, sexual orientation, national or ethnic origin, immigration status and citizenship, and disability. Identifying these sources helps determine whether “membership in the claimant group is associated with certain characteristics that have

¹³ *Andrews*, at p. 168 (emphasis added) [**Andrews**]; see also *Fraser*, at para. 41.

¹⁴ *Fraser*, at para. 42.

¹⁵ *Fraser*, at para. 50.

¹⁶ Watson Hamilton and Koshan, at p. 197.

¹⁷ *Fraser*, at paras. 56-57; *Withler*, at para. 43.

¹⁸ *Fraser*, at para. 57, citing *Homer v. Chief Constable of West Yorkshire Police*, [2012] 3 All ER 1287 (SC), at para. 14; *Ont. Human Rights Comm. v. Simpsons-Sears*, [1985 CanLII 18 \(SCC\)](#), [1985] 2 SCR 536; *British Columbia (Public Service Employee Relations Commission) v. BCGSEU*, [1999 CanLII 652 \(SCC\)](#), [1999] 3 SCR 3, at para. 11.

¹⁹ Appellant’s factum, at paras. 63-125.

²⁰ *Egan*, at para. 53 per L’Heureux Dubé J.; see also: *Withler*, at para. 58.

²¹ Colleen Sheppard, “Grounds-Based Distinctions: Contested Starting Points in Equality Law” (2023) 35 CJWL/RFD 1, at p. 25 [**Sheppard**].

²² *Fraser*, at para. 116.

disadvantaged [its] members.”²³ That is, at the first step of the s. 15(1) test, courts must consider not only a claimant’s circumstances in a general sense, but, in particular, evidence of *other barriers that distinctly burden the claimant group*.

14. To be clear, taking note of intersecting sources of inequality does not require courts to hold that an impugned law has a disproportionate or differential impact based on each pre-existing disadvantage, although, depending on the case, it might be appropriate to do so. But neither does the presence of a pre-existing disadvantage affecting the claimant group preclude an adverse effect discrimination claim from success, as the Appellant seems to suggest.

15. To the contrary: in adverse effect discrimination claims, considering such disadvantage at the first step of the test may reveal how seemingly neutral laws and policies can be ill-designed for members of the claimant subgroup.²⁴ As this Court explained in *Withler*, “[h]istorical or sociological disadvantage may assist in demonstrating that the law imposes a burden or denies a benefit to the claimant that is not imposed on or denied to others.”²⁵ The claimant need not establish that “the law itself was responsible for creating the background social or physical barriers which made a particular rule, requirement or criterion disadvantageous for the claimant group.”²⁶

16. Because pre-existing disadvantage can manifest in various forms, statistical evidence should not be required to establish a distinction in every case.²⁷ For example, in claims of adverse effect discrimination rooted in failure to accommodate, where the distinction in question is alleged to result from the *qualitative impact* of a provision on a claimant, statistical evidence demonstrating that impact might not only be impossible to obtain but will often be irrelevant.²⁸ In such cases, the focus is on the fact that the claimant group or subgroup is *differently* affected by the impugned legislation, an element that statistics might simply not be able to capture.²⁹ In contrast, in adverse effect claims rooted in disproportionate impact (e.g., where one group or subgroup is *more frequently* affected by the impugned provisions),³⁰ statistical evidence may be

²³ *Fraser*, at para. 57.

²⁴ *Fraser*, at para. 57.

²⁵ *Withler*, at para. 64 [emphasis added].

²⁶ *Fraser*, at para. 71.

²⁷ *Sharma*, at para. 49 (a); *Fraser*, at para. 59; on the need for flexibility in assessing s. 15 (1) claims, see also: *Quebec v. A*, at para. 331; *Andrews*, at p. 168.

²⁸ *Fraser*, at paras. 34 and 54.

²⁹ Jonnette Watson Hamilton and Jennifer Koshan, “Sharma: The Erasure of Both Group-Based Disadvantage and the Individual Impact” (2024) 115 SCLR (2d) 113, at p. 135.

³⁰ *Fraser*, at paras. 46 and 53.

relevant to establishing that disproportionate impact, but courts should remain mindful that issues that disproportionately affect certain populations may be under-documented or insufficiently captured by statistics³¹ – a particular risk for the most marginalized members of a protected group.

17. In such situations, qualitative, systemic, and contextual evidence may be the only means of assessing the impact of a law on a claimant group;³² this Court has also encouraged openness to applying logical reasoning and making appropriate use of judicial notice.³³ In all cases, a flexible approach to the evidence at the first stage of the analysis is the only approach that allows for a comprehensive assessment of disadvantage, ensuring that equality-seeking groups are not excluded from protection simply because their experiences are not fully reflected in statistical data.

18. Here, it is ultimately only in considering all the Respondent's circumstances (i.e., the fact that she is not only a woman but a Black woman claiming refugee status who holds a work permit but requires childcare to work) that the Court can appreciate the full impact that being excluded from accessing affordable childcare had on Ms. Kanyinda. To the extent this entails considering existing disadvantage that might stem from the Respondent belonging to *a particular subgroup of women*, doing so is appropriate. Indeed, it is a necessary aspect of determining whether the *Regulation* has a qualitatively different impact on, at the very least, a certain subset of women.

B. Remedial Legislation Must Abide by the Same Animating Norm of Substantive Equality

19. The remedial nature of legislation does not shield it from scrutiny under s. 15(1); nor does its remedial character create a higher bar for a claimant at the second stage of the s. 15(1) test.³⁴ The state cannot hide behind a challenged program's remedial aims, particularly when that program intentionally excludes the most marginalized individuals within a protected group. When the state takes action to redress a social inequality, it must do so in a non-discriminatory way.³⁵

³¹ *Sharma*, at para. 49 (c); *Fraser*, at para. 57.

³² *Fraser*, at paras. 61 and 66. *Contra*: *Sharma*, at para. 71.

³³ *Fraser* at para. 56; *Law*, at paras. 77-79, citing to *Andrews*, at p. 152.

³⁴ *Fraser*, at para. 69; *Quebec (Attorney General) v. Alliance du personnel professionnel et technique de la santé et des services sociaux*, [2018 SCC 17](#), at para. 42 [*Alliance*]; *Centrale des syndicats du Québec v. Québec (Procureure générale)*, [2018 SCC 18](#), at paras. 31-36 [*Centrale*]; *Canada (Attorney General) v. Hislop*, [2007 SCC 10](#), at para. 39.

³⁵ *Alliance*, at para. 42; *Eldridge v. British Columbia (Attorney General)*, [1997 CanLII 327 \(SCC\)](#), [1997] 3 SCR 624, at para. 73 [*Eldridge*] citing *Tétreault-Gadoury v. Canada (Employment and Immigration Commission)*, [1991 CanLII 12 \(SCC\)](#), [1991] 2 SCR 22 [*Tétreault-Gadoury*], *Haig*

20. At the second step of the s. 15(1) test, the Court must ask whether the impugned legislation has the effect of reinforcing, perpetuating, or exacerbating disadvantage.³⁶ While there is no “rigid template” of factors relevant to this inquiry,³⁷ intersectionality remains central to the analysis. A full appreciation of the impact of impugned legislation demands an examination of a claimant’s entire context, including any intersecting sources of marginalization. This is because when legislation purports to benefit a protected group but excludes those within the group who face additional layers of disadvantage, it exacerbates the harms the law claims to address, or, at the very least, reinforces and perpetuates the disadvantageous situation *for that subset of the group*.³⁸

21. This mechanism or mode of inequality is exactly what this Court recognized in *Alliance*. That case involved a challenge to pay equity legislation that attacked an existing social problem – a gender-based pay gap – but simultaneously tolerated a certain degree of pay discrimination by limiting the relief that women could seek when pay inequity was discovered. This Court held that, by providing only partial redress for pay inequity, the legislation codified the very problem it was attempting to remedy.³⁹ The fact that the legislation sought to remedy a social inequality did not prevent the Court from rightly recognizing that, for some women, it perpetuated an existing disadvantage. The holding in *Alliance* thus recognizes that substantive equality may require expanding the scope of an underinclusive benefit or protection⁴⁰ or taking proactive steps to accommodate the needs of a smaller subgroup of members within a protected group, “for example by extending the scope of a benefit to a previously excluded class of persons.”⁴¹

22. Moreover, remedial legislation is often designed to enable fuller participation in society by its intended beneficiaries,⁴² consistent with the core principles of substantive equality, which seeks

v. Canada (Chief Electoral Officer), [1993 CanLII 57 \(SCC\)](#), [1993] 2 SCR 995, at pp. 1041-42, *Native Women’s Assn. of Canada v. Canada*, [1994 CanLII 27 \(SCC\)](#), [1994] 3 SCR 627, at p. 655, and *Miron v. Trudel*, [1995 CanLII 97 \(SCC\)](#), [1995] 2 SCR 418 [*Miron*].

³⁶ *Fraser*, at para. 76, *Alliance*, at para. 25.

³⁷ *Quebec v. A*, at para. 331; *Withler*, at para. 66.

³⁸ *Alliance*, at paras. 37-38; See, e.g., *Vriend v. Alberta*, [1998 CanLII 816 \(SCC\)](#), [1998] 1 SCR 493 [*Vriend*]; *Tétreault-Gadoury*; *Eldridge*, at para. 73; *Schachter v. Canada*, [1992 CanLII 74 \(SCC\)](#), [1992] 2 SCR 679 [*Schachter*].

³⁹ *Alliance*, at paras. 37-38.

⁴⁰ See e.g. *Vriend*; *Tétreault-Gadoury*; *Schachter*.

⁴¹ *Eldridge*, at para. 73.

⁴² E.g., in *Fraser*, the job-sharing program was designed to accommodate employees’ personal and

not only to address disadvantage, but to empower individuals and affirm their ability to shape their own lives.⁴³ In this context, a statutory exclusion from the benefits of remedial legislation can itself act as a barrier to social inclusion and reinforce the marginalization of the most vulnerable members of the target group, thus perpetuating and exacerbating their inequality.

23. In the present case, the relationship between subsidized childcare and women's social inclusion cannot be ignored. The *Regulation* supports women's participation in the workforce⁴⁴ by providing access to subsidized childcare. In other words, it is part of a program designed to enforce and promote women's socioeconomic participation.

24. This measure is essential given that in Canada, "women bear a disproportionate share of the child care burden."⁴⁵ The uneven distribution of childcare responsibilities "is one of the 'persistent systemic disadvantages [that] have operated to limit the opportunities available' to women in Canadian society,"⁴⁶ as women who assume primary responsibility for childcare see their career opportunities and earning capacity diminish relative to men.

25. But not all women are equally affected by this systemic burden. The economic impact of barriers to workplace participation due to childcare responsibilities can be especially acute for women whose identity and experiences encompass "intersecting sources of inequality".⁴⁷

26. In particular, for the "highly racialized population"⁴⁸ of women seeking asylum, access to affordable childcare helps alleviate that burden and encourages these women's full and equal participation not only in the workforce but more generally in all aspects of Canadian and Quebec

family circumstances that would have otherwise forced them to take leave without pay: para. 91.

⁴³ See Martha Jackman, "Giving Real Effect to Equality: *Eldridge v. British Columbia (Attorney General)* and *Vriend v. Alberta*" (1998) 4 Rev Const Stud 352 at 371; see also: *Gosselin v. Québec (Attorney General)*, [2002 SCC 84](#), at para. 20; *Law*, at para. 53.

⁴⁴ Appellant's factum, at para. 129; see also *Educational Childcare Act*, [CQLR, c. S-4.1.1](#), s. 1.

⁴⁵ *Symes v. Canada*, [1993 CanLII 55 \(SCC\)](#), [1993] 4 SCR 695, at pp. 762-63; see also: *Young v. Young*, [1993 CanLII 34 \(SCC\)](#), [1993] 4 SCR 3, at pp. 49-50; *Fraser*, at paras. 103-104; see also: *Brooks v. Canada Safeway Ltd.*, [1989 CanLII 96 \(SCC\)](#), [1989] 1 SCR 1219, at para. 32.

⁴⁶ *Fraser*, at para. 116, citing *Kahkewistahaw First Nation v. Taypotat*, [2015 SCC 30](#), at para. 17; see also *Moge v. Moge*, [1992 CanLII 25 \(SCC\)](#), [1992] 3 SCR 813, at p. 861.

⁴⁷ Sheppard, at p. 25.

⁴⁸ Report from Dr. Jill Hanley, November 4, 2020, A.R., vol. 2, at p. 87.

society.⁴⁹ In other words, access to affordable childcare is not just a critical step toward labour market entry – it is also a key pathway to social and economic integration in their new country.⁵⁰

27. Accordingly, while it has become clear since the implementation of the *Regulation* that providing access to subsidized childcare has significantly improved the participation of Quebec women in the labour market,⁵¹ refusing women seeking asylum who have been granted work permits access to this service has a different effect: it undermines these women’s integration into the workforce and delays their integration into Quebec society.⁵² Ironically, in excluding one of the subgroups arguably most in need of the benefit in question,⁵³ the *Regulation* crystallizes a denial of social participation and equality to these women.

28. A statutory exclusion that acts as a barrier to integration and a confirmation of the marginalization of the most vulnerable members of a target group has the effect of exacerbating or, at the very least, reinforcing and perpetuating inequality. In other words, tolerating a situation of inequality for some members of a group by excluding them from the ambit of remedial legislation while improving this situation for other members of the same group is still discriminatory, in that it perpetuates existing inequality for the *some*.

29. Again, the remedial goals pursued by the legislature in adopting the impugned provisions cannot prevent a determination – based on evidence – that the provision is discriminatory. To the extent that courts owe deference to the legislature when crafting “multi-faceted remedial regimes”,⁵⁴ such deference is principally a factor under s. 1 and should not be used to *de facto* subject ameliorative legislation to less stringent constitutional review.

30. At the second step of the section 15(1) analysis, the focus must remain squarely on the actual impact of the legislation on the claimant group, including all its subsets, and not on the legislation’s aims, no matter how well-meaning. The equality guarantee under s. 15 is concerned

⁴⁹ Royal Commission on Equality in Employment, *Report of the Commission on Equality in Employment*, (Ottawa: Supply and Service Canada, 1984), chapter 5, pp. 177 and following cited, notably, in *Fraser*, at para. 101.

⁵⁰ Report from Dr. Jill Hanley, November 4, 2020, A.R., vol. 2, at pp. 86-87.

⁵¹ Report from Dr. Jill Hanley, November 4, 2020, A.R., vol. 2, at pp. 75 and following.

⁵² Report from Dr. Jill Hanley, November 4, 2020, A.R., vol. 2, at pp. 86-87.

⁵³ Sheppard, at p. 23.

⁵⁴ *Alliance*, at para. 46 citing *RJR-MacDonald Inc. v. Canada (Attorney General)*, [1995 CanLII 64 \(SCC\)](#), [1995] 3 SCR 199, at para. 135; *Irwin Toy Ltd. v. Quebec (Attorney General)*, [1989 CanLII 87 \(SCC\)](#), [1989] 1 SCR 927, at pp. 993-94.

with effects, not motives.⁵⁵ Shifting the focus to legislative purpose at this stage risks diluting the rigorous scrutiny required to uncover discriminatory impact and “reducing the inquiry to a search for a ‘rational basis’ for the impugned law.”⁵⁶

31. In any event, any doubt as to the relevance of governmental objectives was resolved in *Fraser*, which this Court did not overturn in *Sharma*.⁵⁷ In *Fraser*, this Court made clear that “the perpetuation of disadvantage [...] does not become less serious under s. 15(1) simply because it was relevant to a legitimate state objective.”⁵⁸ Evaluating the legitimacy of government objectives belongs under s. 1, where the state bears the burden of justification – not under s. 15, which is designed to centre the experiences of those alleging discrimination.

32. Likewise, while this Court in *Withler* acknowledged that where the impugned law forms part of a broader benefits scheme, the ameliorative effects on others and the multiplicity of interests at play may “colour the discrimination analysis”,⁵⁹ this consideration cannot overshadow the core inquiry at the second step of the section 15 test. The focus must remain firmly on the circumstances of the claimant group and the actual impact of the law on them. Legislative context might assist with understanding the impact of an impugned provision *on the claimant*.⁶⁰ However, the fact that the legislation might improve the circumstances of some other individuals will not help that legislation pass the second step of s. 15(1) if it nevertheless perpetuates a claimant group’s disadvantage.

PART IV & V: COSTS AND ORDER SOUGHT

33. LEAF takes no position on the disposition of this appeal, seeks no order as to costs, and asks that no award of costs be made against it.

ALL OF WHICH IS RESPECTFULLY SUBMITTED, April 24, 2025.

IMK s.e.n.c.r.l

Olga Redko & Vanessa Ntaganda
Counsel for the Intervener, Women’s Legal and Education Action Fund

⁵⁵ *Fraser*, at para. 41; *Centrale*, at para. 35; *Quebec v. A*, at para. 328; *Andrews*, at p. 174.

⁵⁶ *Fraser*, at para. 79.

⁵⁷ *Sharma*, at para. 34.

⁵⁸ *Fraser*, at para. 79.

⁵⁹ *Withler*, at para. 38.

⁶⁰ See e.g.: *R. v. C.P.*, [2021 SCC 19](#), at paras. 152-159 per Wagner C.J.

PART VI: TABLE OF AUTHORITIES

JURISPRUDENCE	CITED AT PARA.
<i>Andrews v. Law Society of British Columbia</i> , 1989 CanLII 2 (SCC) , [1989] 1 SCR 143	9-10, 16,30
<i>Bliss v. Attorney General of Canada</i> , 1978 CanLII 25 (SCC) , [1979] 1 SCR 183	9
<i>British Columbia (Public Service Employee Relations Commission) v. BCGSEU</i> , 1999 CanLII 652 (SCC) , [1999] 3 SCR 3	11
<i>Brooks v. Canada Safeway Ltd.</i> , 1989 CanLII 96 (SCC) , [1989] 1 S.C.R. 1219	24
<i>Canada (Attorney General) v. Hislop</i> , 2007 SCC 10	19
<i>Centrale des syndicats du Québec v. Québec (Attorney General)</i> , 2018 SCC 18	19,30
<i>Egan v. Canada</i> , 1995 CanLII 98 (SCC) , [1995] 2 S.C.R. 513	6, 12, 21-22
<i>Eldridge v. British Columbia (Attorney General)</i> , 1997 CanLII 327 (SCC) , [1997] 3 S.C.R. 624	19-21
<i>Fraser v. Canada (Attorney General)</i> , 2020 SCC 28	5-8, 10-11, 13, 15-17, 19-20, 24, 26, 30-31
<i>Gosselin v. Québec (Attorney General)</i> , 2002 SCC 84	22
<i>Haig v. Canada (Chief Electoral Officer)</i> , 1993 CanLII 57 (SCC) , [1993] 2 S.C.R. 995	19
<i>Homer v. Chief Constable of West Yorkshire Police</i> , [2012] 3 All ER 1287 (SC)	11
<i>Irwin Toy Ltd. v. Québec (Attorney General)</i> , 1989 CanLII 87 (SCC) , [1989] 1 S.C.R. 927	29
<i>Kahkewistahaw First Nation v. Taypotat</i> , 2015 SCC 30 ,	24

<i>Law v. Canada (Minister of Employment and Immigration)</i> , 1999 CanLII 675 (SCC) , [1999] 1 S.C.R. 497	7, 11, 17, 22
<i>Miron v. Trudel</i> , 1995 CanLII 97 (SCC) , [1995] 2 S.C.R. 418	19
<i>Moge v. Moge</i> , 1992 CanLII 25 (SCC) , [1992] 3 R.C.S. 813	24
<i>Native Women's Assn. of Canada v. Canada</i> , 1994 CanLII 27 (SCC) , [1994] 3 S.C.R. 627	19
<i>Nova Scotia (Workers' Compensation Board) v. Martin</i> , 2003 CSC 54	5
<i>Ont. Human Rights Comm. v. Simpsons-Sears</i> , 1985 CanLII 18 (SCC) , [1985] 2 SCR 536	11
<i>Procureur général du Québec v. Kanyinda</i> , 2024 QCCA 144	8
<i>Quebec (Attorney General) v. A.</i> , 2013 SCC 5	5, 16, 20, 30
<i>Quebec (Attorney General) v. Alliance du personnel professionnel et technique de la santé et des services sociaux</i> , 2018 SCC 17	7, 19-21, 29-30
<i>Schachter v. Canada</i> , 1992 CanLII 74 (SCC) , [1992] 2 SCR 679.	20-21
<i>Symes v. Canada</i> , 1993 CanLII 55 (SCC) , [1993] 4 S.C.R. 695	24
<i>Tétreault-Gadoury v. Canada (Employment and Immigration Commission)</i> , 1991 CanLII 12 (SCC) , [1991] 2 S.C.R. 22	19-21
<i>RJR-MacDonald Inc. v. Canada (Attorney General)</i> , 1995 CanLII 64 (SCC) , [1995] 3 S.C.R. 199	29
<i>R. v. C.P.</i> , 2021 SCC 19	32
<i>R. v. Sharma</i> , 2022 SCC 39	5-7, 16, 17, 23, 25, 30
<i>Vriend v. Alberta</i> , 1998 CanLII 816 (SCC) , [1998] 1 S.C.R. 493	20-21
<i>Withler v. Canada (Attorney General)</i> , 2011 SCC 12	5-6, 12, 15, 20, 32

<i>Young v. Young</i> , 1993 CanLII 34 (SCC) , [1993] 4 S.C.R. 3	24
LEGISLATION AND REGULATIONS	CITED AT PARA
<i>Bill of Rights</i> , SC 1960, c. 44.	9
<i>Canadian Charter of Rights and Freedoms</i> , <i>The Constitution Act</i> , schedule B to the <i>Canada Act</i> , 1982 (UK), 1982, c.11.	1-3,5-6, 8-11, 13, 19-20, 31-32
<i>Educational Childcare Act</i> , CQLR, c. S-4.1.1	23
<i>Reduced Contribution Regulation</i> , CQLR, c. S-4.1.1, r. 1.	1, 3,12, 18, 23, 27
OTHER SOURCES	CITED AT PARA
Colleen Sheppard “Grounds-Based Distinctions: Contested Starting Points in Equality Law” (2023) <i>CJWL/RFD</i> , vol. 35 3	13, 25, 27
Colleen Sheppard, <i>Inclusive Equality: The Relational Dimensions of Systemic Discrimination in Canada</i> (Montréal: McGill-Queen’s University Press, 2010)	7
Jonnette Watson Hamilton and Jennifer Koshan, “Adverse Impact: The Supreme Court’s Approach to Adverse Effects Discrimination under Section 15 of the Charter” (2015), 19 Rev. Const. Stud. 191	5,11, 21
Jonnette Watson Hamilton and Jennifer Koshan, “Sharma: The Erasure of Both Group-Based Disadvantage and the Individual Impact” (2024) 115 SCLR (2d) 113	16
Martha Jackman, “Giving Real Effect to Equality: <i>Eldridge v. British Columbia (Attorney General)</i> and <i>Vriend v. Alberta</i> ” (1998) 4 Rev Const Stud 352	22
Royal Commission on Equality in Employment, <i>Report of the Commission on Equality in Employment</i> , (Ottawa: Supply and Service Canada, 1984), chapter 5	26

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719205

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Alexandra (Lex) Gill, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Alexandra (Lex) Gill
Email	lex@tjl.quebec

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719198

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Amanda Afeich, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Amanda Afeich
Email	aafeich@blg.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report number **A651045R719160**

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Bonjour Amélie Pelletier Desrosier, vous êtes par la présente notifié(e) du/des document(s) ci-joint(s). Un rapport de confirmation comprenant une preuve de notification a été envoyé à Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Amélie Pelletier Desrosier
Email	amelie.pelletier-desrosiers@justice.gouv.qc.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.6.0 <680a962fdd1b9_11f25c13547c@pronotif-sidekiq-774b467df-tzsq2.mail> [InternalId=10333691337631, Hostname=YQBPR0101MB9085.CANPRD01.PROD.OUTLOOK.COM] 86349 bytes in 0.067, 1248.938 KB/sec Queued mail for delivery
ID SMTP Message	cLIGjtXuRISY_DNxzJ0o4A.recvd-545d4d4647-748np-1-680A9630-1B.0
ID SMTP	<680a962fdd1b9_11f25c13547c@pronotif-sidekiq-774b467df-tzsq2.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719181

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Amy Nguyen, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Amy Nguyen
Email	nguyen.amy@lacsq.org

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719182

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Ariane Roberge, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Ariane Roberge
Email	roberge.ariane@lacsq.org

Proof of Transmission

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719178

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Asher Honickman, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Asher Honickman
Email	ahonickman@jhbarristers.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719170

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Ashley A. Caron, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Ashley A. Caron
Email	ashley.caron@gov.bc.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719175

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Bernard Letarte, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Bernard Letarte
Email	sccagentcorrespondantcsc@justice.gc.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report **A651045R719206**
number

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Bruce W. Johnston, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Bruce W. Johnston
Email	bruce@tjl.quebec

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.6.0 <680a9630830e6_12006c136415@pronotif-sidekiq-774b467df-2ghvt.mail> [InternalId=18816251747760, Hostname=YT2PR01MB9013.CANPRD01.PROD.OUTLOOK.COM] 85155 bytes in 0.202, 409.859 KB/sec Queued mail for delivery
ID SMTP Message	IYQl3kxoRf2quCcuZpsqiQ.recvd-84ff9c6c5c-6vhxb-1-680A9631-2.0
ID SMTP	<680a9630830e6_12006c136415@pronotif-sidekiq-774b467df-2ghvt.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719179

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Chelsea Dobrindt, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Chelsea Dobrindt
Email	cdobrindt@jhbarristers.com

Proof of Transmission

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719193

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Cheryl Milne, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Cheryl Milne
Email	cheryl.milne@utoronto.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report **A651045R719163**
number

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Christine Campbell, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Christine Campbell
Email	christine.campbell@cdpdj.qc.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.6.0 <680a96304fa74_11f0b8109723@pronotif-sidekiq-774b467df-7bpqb.mail> [InternalId=46523085772647, Hostname=YT3PR01MB6300.CANPRD01.PROD.OUTLOOK.COM] 85391 bytes in 0.124, 671.954 KB/sec Queued mail for delivery
ID SMTP Message	V9AKlqH0SK-dXmroawIFGQ.recvd-84ff9c6c5c-mxferk-1-680A9630-1A.0
ID SMTP	<680a96304fa74_11f0b8109723@pronotif-sidekiq-774b467df-7bpqb.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719159

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Bonjour Christophe Achdjian, vous êtes par la présente notifié(e) du/des document(s) ci-joint(s). Un rapport de confirmation comprenant une preuve de notification a été envoyé à Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Christophe Achdjian
Email	christophe.achdjian@justice.gouv.qc.ca

Proof of Transmission

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719203

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Colin Grey, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Colin Grey
Email	colin.grey@queensu.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719187

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Connor Bildfell, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Connor Bildfell
Email	cbildfell@mccarthy.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report number **A651045R719202**

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day David P. Taylor, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	David P. Taylor
Email	dtaylor@conwaylitigation.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.6.0 <680a96307ebda_12030013637a@pronotif-sidekiq-774b467df-tzsq2.mail> [InternalId=16110422352684, Hostname=YQXPR01MB5339.CANPRD01.PROD.OUTLOOK.COM] 85396 bytes in 0.268, 310.960 KB/sec Queued mail for delivery
ID SMTP Message	nwdC4sgvRWm2fmomSNL1Yw.recvd-545d4d4647-gvb4f-1-680A9631-9.0
ID SMTP	<680a96307ebda_12030013637a@pronotif-sidekiq-774b467df-tzsq2.mail>

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report number **A651045R719166**

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day D. Lynne Watt, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	D. Lynne Watt
Email	lynne.watt@gowlingwlg.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719196

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day François Grondin, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	François Grondin
Email	fgrondin@blg.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719172

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day François Joyal, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	François Joyal
Email	francois.joyal@justice.gc.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719208

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Gib Van Ert, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Gib Van Ert
Email	gvanert@ovcounsel.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719213

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Gjergji Hasa, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Gjergji Hasa
Email	g.hasa@havocats.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719162

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Guillaume Grenier, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Guillaume Grenier
Email	ggrenier@mmgc.quebec

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719176

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Guillaume Pelegrin, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Guillaume Pelegrin
Email	gpelegrin@fasken.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report **A651045R719177**
number

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Jean-François Trudelle, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Jean-François Trudelle
Email	jtrudelle@fasken.com

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.6.0 <680a963124136_11f64413723d@pronotif-sidekiq-774b467df-tzsq2.mail> [InternalId=51423643457613, Hostname=YT2PR01MB5661.CANPRD01.PROD.OUTLOOK.COM] 85338 bytes in 0.169, 490.348 KB/sec Queued mail for delivery
ID SMTP Message	3t5YrfmlSCirAsueSwRwTw.recvd-545d4d4647-vzpdq-1-680A9631-2E.0
ID SMTP	<680a963124136_11f64413723d@pronotif-sidekiq-774b467df-tzsq2.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719194

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Jean-Simon Schoenholz, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Jean-Simon Schoenholz
Email	jean-simon.schoenholz@nortonrosefulbright.com

Proof of Transmission

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report number **A651045R719186**

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Joshua Eisen, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Joshua Eisen
Email	joshuae@fcjrefugeecentre.org

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719184

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Julien Thibault, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Julien Thibault
Email	jthibault@mmgc.quebec

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719173

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Justine Malone, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Justine Malone
Email	justine.malone@justice.gc.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719164

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Justine St-Jacques, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Justine St-Jacques
Email	justine.st-jacques@cdpdj.qc.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719197

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Karine Fahmy, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Karine Fahmy
Email	kfahmy@blg.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report number **A651045R719209**

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Karine Joizil, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Karine Joizil
Email	kjoizil@mccarthy.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 ok: Message 49946600 accepted
ID SMTP Message	Ax_YDjCzSoaYNk3ZQYW31Q.recvd-545d4d4647-j8xnv-1-680A9633-21.0
ID SMTP	<680a9632cd37d_11f784113110@pronotif-sidekiq-774b467df-7bpqb.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719201

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Kartiga Thavaraj, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Kartiga Thavaraj
Email	kartiga.thavaraj@paliareroland.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719191

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Kerri Froc, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Kerri Froc
Email	kerri.froc@unb.ca

Proof of Transmission

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719212

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Lawrence David, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Lawrence David
Email	l.david@havocats.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719165

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Leah M. McDaniel, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Leah M. McDaniel
Email	leah.mcdaniel@gov.ab.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719174

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Lindy Rouillard-Labbé, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Lindy Rouillard-Labbé
Email	lindy.rouillard-labbe@justice.gc.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719157

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Bonjour Luc-Vincent Gendron-Bouchard, vous êtes par la présente notifié(e) du/des document(s) ci-joint(s). Un rapport de confirmation comprenant une preuve de notification a été envoyé à Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Luc-Vincent Gendron-Bouchard
Email	luc-vincent.gendron-bouchard@justice.gouv.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719168

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Maia Stevenson, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Maia Stevenson
Email	maia.stevenson@ontario.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.6.0 <680a9632ce48c_11f3b0139744@pronotif-sidekiq-774b467df-2ghvt.mail> [InternalId=9569187162175, Hostname=YQBPR0101MB9392.CANPRD01.PROD.OUTLOOK.COM] 85509 bytes in 0.131, 635.455 KB/sec Queued mail for delivery
ID SMTP Message	xKaawURoQOmVbTxt-j7CyA.recvd-545d4d4647-bjns1-1-680A9633-31.0
ID SMTP	<680a9632ce48c_11f3b0139744@pronotif-sidekiq-774b467df-2ghvt.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719200

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Mannu Chowdhury, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Mannu Chowdhury
Email	mannu.chowdhury@paliarerland.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719156

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Bonjour Manuel Klein, vous êtes par la présente notifié(e) du/des document(s) ci-joint(s). Un rapport de confirmation comprenant une preuve de notification a été envoyé à Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Manuel Klein
Email	manuel.klein@justice.gouv.qc.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719169

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Marie-France Major, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Marie-France Major
Email	mfmajor@supremeadvocacy.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file	Women's Legal Education and Action Fund Inc.
number	41210
Generated on	Thursday, April 24 2025, at 15:51
Report	A651045R719190
number	

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Martha Jackman, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Martha Jackman
Email	martha.jackman@uottawa.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.0.0 Ok: queued as 897BE34B0
ID SMTP Message	oPOuyNfvRLODoxFgXbTsNw.recvd-canary-75c45489bb-4kc97-1-680A9633-4D.0
ID SMTP	<680a963365284_120030140933@pronotif-sidekiq-774b467df-2ghvt.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719171

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Michael Sobkin, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Michael Sobkin
Email	msobkin@sympatico.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719183

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Mohsen Seddigh, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Mohsen Seddigh
Email	mseddigh@sotosllp.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719199

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Nadia Effendi, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Nadia Effendi
Email	neffendi@blg.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719211

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Natasha Petrof, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Natasha Petrof
Email	npetrof@mccarthy.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719207

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Neil Abraham, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Neil Abraham
Email	nabraham@ovcounsel.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719204

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Peter Shams, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Peter Shams
Email	peter@hadekelshams.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719158

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Bonjour Pierre Landry, vous êtes par la présente notifié(e) du/des document(s) ci-joint(s). Un rapport de confirmation comprenant une preuve de notification a été envoyé à Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Pierre Landry
Email	p.landry@noelassocies.com

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report number **A651045R719180**

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Pierre-Luc Bouchard, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Pierre-Luc Bouchard
Email	p.bouchard@therefugeecentre.org

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.0.0 OK 1745524276 3f1490d57ef6-e730630d448si1709728276.36 - gsmtip
ID SMTP Message	FvgYBEUYToSEMim92UAQQg.recvd-545d4d4647-bgxf4-1-680A9633-48.0
ID SMTP	<680a9632b05d9_11f4b41389b9@pronotif-sidekiq-774b467df-tzsq2.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719195

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Robin Nobleman, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Robin Nobleman
Email	robin.nobleman@isac.clcj.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report **A651045R719167**
number

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Rochelle Fox, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Rochelle Fox
Email	rochelle.fox@ontario.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 2.6.0 <680a96333d06b_11f11c1403d3@pronotif-sidekiq-774b467df-tzsq2.mail> [InternalId=3835405815480, Hostname=YT2PR01MB5467.CANPRD01.PROD.OUTLOOK.COM] 85618 bytes in 0.142, 587.298 KB/sec Queued mail for delivery
ID SMTP Message	iffFjXInSjerlQdz52Cmeg.recvd-545d4d4647-gvb4f-1-680A9633-20.0
ID SMTP	<680a96333d06b_11f11c1403d3@pronotif-sidekiq-774b467df-tzsq2.mail>

Subject Notification - Factum of the Intervener
Case name Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file Women's Legal Education and Action Fund Inc.
number 41210
Generated on Thursday, April 24 2025, at 15:51
Report **A651045R719210**
number

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Sajeda Hedaraly, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Sajeda Hedaraly
Email	shedaraly@mccarthy.ca

Proof of Transmission

Date & Time	Apr. 24, 25 - 3:51 PM
Status	Message successfully delivered to recipient
SMTP	250 ok: Message 54023579 accepted
ID SMTP Message	AWjhH6PUR22RjyeGMv5Z-Q.recvd-545d4d4647-gvb4f-1-680A9633-1F.0
ID SMTP	<680a96336a99_11f5b813971c@pronotif-sidekiq-774b467df-tzsq2.mail>

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719161

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Sibel Ataogul, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Sibel Ataogul
Email	sataogul@mmgc.quebec

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719188

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Simon Bouthillier, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Simon Bouthillier
Email	sbouthillier@mccarthy.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719192

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Suzanne Zaccour, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Suzanne Zaccour
Email	suzanne.zaccour@nawl.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719189

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dadb1924c22ed4fc93538a13578c6d

Message

Good day Vince Calderhead, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Vince Calderhead
Email	vcalderehead@pinklarkin.ca

Proof of Transmission

The data in this report will be available within 30 min.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc.
Generated on	41210
Report number	Thursday, April 24 2025, at 15:51
	A651045R719185

Document(s) Notified

File Name	Pages	Document Integrity
imk-leaf-factum-2025-04-24.pdf	26	(SHA256 checksum): b47beb338f8b28bde4bdbf6ea96a01a8d6dacb1924c22ed4fc93538a13578c6d

Message

Good day Yin Yuan Chen, you are hereby notified with the attached document(s). A confirmation report with a proof of notification has been provided to Jeremy-Christian Taoingan.

Sent from

Name	Jeremy-Christian Taoingan
Email	jctaoingan@imk.ca

Sent to

Name	Yin Yuan Chen
Email	yy.chen@uottawa.ca

Proof of Transmission

The data in this report will be available within 30 min.

Pronotif certifies that it has made this email and all attached documents available to the recipient. According to [article 134 of the Code of Civil Procedure of Quebec](#), this email and attached documents can be considered proof of notification by technological means.

Subject	Notification - Factum of the Intervener
Case name	Attorney General of Québec and Bijou Cibuabua Kanyinda and Commission des Droits de la Personne et des Droits de la Jeunesse and
Court file number	Women's Legal Education and Action Fund Inc. 41210
Generated on	Thursday, April 24 2025, at 15:51
Report number	A651045R719185

Annex to the Proof Report - Additional Explanatory Document

The purpose of this document is to provide detailed explanations concerning the validity and legitimacy of electronic proofs of transmission generated via the Pronotif tool. This tool enables you to send notifications by secure e-mail, ensuring full traceability of dispatches and secure archiving of proofs.

This document accompanies the proof report issued by Pronotif, and aims to provide a comprehensive description of each step in the e-mail transmission process, as well as the technical features that ensure the reliability of the tool.

Operation and Guarantees of Pronotif

1. Email Address Verification:

- Before sending emails, Pronotif verifies the existence of the recipient's email address. This verification is performed through a query to the mail server to ensure that the email address is valid and capable of receiving messages. This guarantees that emails are not sent to non-existent or incorrect addresses.

2. Data Encryption:

- To ensure the security of transmitted information, Pronotif uses advanced encryption protocols. This encryption protects the content of the emails sent, thereby guaranteeing the confidentiality and integrity of sensitive data during transmission. This measure prevents unauthorized access to the information.

3. Traceability of Transmissions:

- Each email sent through the Pronotif tool is precisely traceable and time-stamped. The integrated tracking system relies on the use of tracking pixels inserted into the emails, allowing for the accurate recording of the date and time the message was transmitted to the recipient, as well as all actions taken on the message. All actions related to the notifications are logged with precise timestamps, providing clear evidence of the actions taken.

4. Time-Stamped Proofs:

- Each step of the transmission process is accompanied by a time-stamped proof. These proofs confirm that the actions were carried out properly and in due form.

5. Mail Server Responses:

- Pronotif analyzes the responses from mail servers to verify that the email was successfully transmitted to the recipient. In the case of a rejection or error, such as an incorrect email address, a notification is sent to the sender, allowing corrective measures to be taken. This process ensures the effectiveness of email delivery and guarantees the detection and resolution of any potential delivery issues.

6. Secure Archiving of Proofs:

- All generated proofs (sending, transmission, opening, errors, etc.) are archived in a secure space. These archives are stored and available for verification or disputes if needed. This archiving ensures that the proofs cannot be modified or altered after the fact.

Conclusion

Pronotif is a technological solution that ensures the security and traceability of communications, providing proof that notifications have been sent, received, opened, and that attachments have been downloaded. Through encryption, traceability, and time-stamping, Pronotif is a reliable tool for any electronic transmission with legal value. This document explains the legitimacy of the proof reports generated by Pronotif and guarantees that all critical steps of the transmission process are carried out rigorously and transparently.



SUPREME COURT OF CANADA
Electronic Filing Portal

April 24, 2025 - 3:57 p.m. (Eastern Time)

Filing - Step 8 of 8 - Confirmation

✔ Thank you. The Supreme Court of Canada has received your electronic filing.

⚠ Reminder

Please don't forget to submit Forms 23A and 23B (as required for this matter).

Electronic filing

Email address:	jctaoingan@imk.ca
Name:	Jeremy Taoingan
Date:	April 24, 2025, at 3:57 p.m. (Eastern Time)
Confirmation number:	2025-04-f5r-zrk

Instructions

You will receive an email of this confirmation.

The Registry Branch will contact you once the review of your material is complete.

Should the Registry team have any questions during the validation process, a team member will contact you accordingly.

Contact information

I have verified the contact information provided in the email titled "SCC Portal - Filing Link" and certify that it is accurate or that I have contacted the Registry Branch to make changes.

Existing matter

SCC file number: 41210

Reference number:

Electronic filing confirmation number:

Party

Party name: Women's Legal Education and Action Fund Inc.

Role: Intervener

Documents

File	Category	Type	Subtype	Volume	Amended
IMK - LEAF Factum-2025-04-24.pdf	Intervention	Factum			
IMK-Book of authorities-2025-04-24.pdf	Intervention	Factum			

Other

Sealing or confidentiality order existing in file: No

Publication ban existing in file: No

Urgent filing: No

[Terms and conditions](#)