

**IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE COURT OF APPEAL OF BRITISH COLUMBIA)**

B E T W E E N :

GLEN HANSMAN

Applicant (Respondent)

- and -

BARRY NEUFELD

Respondent

**MOTION RECORD FOR LEAVE TO INTERVENE
BY THE CENTRE FOR FREE EXPRESSION**

(Pursuant to Rules 47, 55 and 56 of the *Rules of the Supreme Court of Canada*)

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**IN THE SUPREME COURT OF CANADA
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IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE COURT OF APPEAL OF BRITISH COLUMBIA)

BETWEEN:

GLEN HANSMAN

Applicant (Respondent)

-and-

BARRY NEUFELD

Respondent

**NOTICE OF MOTION FOR LEAVE TO INTERVENE
BY THE CENTRE FOR FREE EXPRESSION**

(Pursuant to Rules 47, 55 and 56 of the *Rules of the Supreme Court of Canada*)

TAKE NOTICE that the Centre for Free Expression (“CFE”) hereby applies to a Judge of this Honourable Court, at a date to be fixed by the Registrar, pursuant to Rules 47, 55, and 56 of the *Rules of the Supreme Court of Canada* for:

1. An Order granting the CFE leave to intervene in this Appeal, on a without costs basis;
2. An Order granting the CFE leave to file a factum of not more than 10 pages (or such other length as the said Judge may deem appropriate);
3. An Order granting the CFE leave to present oral argument at the hearing of this Appeal of not more than 10 minutes (or such other duration as the said Judge may deem appropriate); and
4. Such further or other Order that the said Judge may deem appropriate.

AND FURTHER TAKE NOTICE that the following documents will be referred to in the support of such motion:

1. The Affidavit of James L. Turk, affirmed on May 9, 2022; and
2. Such further and other material as counsel may advise and may be permitted.

AND FURTHER TAKE NOTICE that the said motion shall be made on the following grounds:

1. The CFE is a non-partisan research, public education, and advocacy centre based in the Faculty of Communication and Design at Ryerson University. The CFE serves as a hub for a wide range of activities related to free expression and the public's right to seek, receive, and share information. It works collaboratively with other academic institutions, as well as national and provincial organizations, to promote a better understanding of the importance of freedom of expression in a democratic society, and to advance expressive freedom rights in Canada and abroad.
2. At the heart of this Appeal is the interpretation and application of s. 4(2)(b) of the *Protection of Public Participation Act*, S.B.C. 2019, c.3, which sets out the so-called "weighing stage" in the anti-SLAPP analysis. This issue directly engages the CFE's interests. Specifically, the CFE has a long-standing and significant interest in protecting the free expression rights of individuals who speak out on matters of public interest – including, by ensuring that individuals are able to respond to the comments or actions of public figures, without being unduly "chilled" by the threat of Strategic Lawsuits Against Public Participation, i.e., "SLAPPs."
3. The CFE has experience and interest in assisting the courts with cases that concern the freedom of expression. The CFE has an established track record of acting as intervener in such cases, both before this Court and others.
4. The CFE also possesses a wealth of relevant expertise, both academic and practical, with which to advise this Court about the implications of its decision in this Appeal. The CFE has a well-founded academic interest in any judicial decision that touches upon the framework for applying anti-SLAPP laws. The CFE not only understands the relevant legal and constitutional principles at stake in this Appeal, but has a distinct awareness of how these principles could practically impact the free expression rights of members of the public.

5. The CFE is well-positioned to offer a unique perspective that can be of assistance to this Court. The CFE seeks to provide the Court with a substantive, impartial, and useful analysis on the legal issues, including whether a “chilling effect” on the expressive activity of a plaintiff should play a role in the “weighing” stage of the anti-SLAPP analysis, and what consideration, if any, a court should give to “defamation-by-mob” scenarios.
6. If granted leave to intervene, the CFE will work with any other interveners to prevent the duplication of submissions.
7. There will be no undue prejudice or delay to the parties.
8. Rules 47, 55, and 56 of the *Rules of the Supreme Court of Canada*.
9. Such further and other grounds as counsel may advise and may be permitted.

DATED at the City of Toronto, Province of Ontario this 9th day of May, 2022



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**Agent for Counsel for the Respondent,
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NOTICE TO THE RESPONDENT TO THE MOTION: A respondent to the motion may serve and file a response to this motion within 10 days after service of the motion. If no response is filed within that time, the motion will be submitted for consideration to a judge or the Registrar, as the case may be.

If the motion is served and filed with the supporting documents of the application for leave to appeal, then the Respondent may serve and file the response to the motion together with the response to the application for leave.

IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE COURT OF APPEAL OF BRITISH COLUMBIA)

B E T W E E N:

GLEN HANSMAN

Applicant (Respondent)

- and -

BARRY NEUFELD

Respondent

AFFIDAVIT OF JAMES L. TURK

(In support of the Motion for Leave to Intervene of the Proposed
Intervener, The Centre for Free Expression)

I, JAMES L. TURK, of the City of Toronto in the Province of Ontario, **AFFIRM THAT**

1. I am the Director of the Centre for Free Expression at Ryerson University (“CFE”), and as such have personal knowledge of the facts and matters to which I hereinafter depose.
2. I make this affidavit in support of the motion brought by the CFE for leave to intervene in this Appeal (as that term is used in the Notice of Motion).

A. The Centre for Free Expression at Ryerson University

3. Established in 2015, the CFE is a non-partisan research, public education, and advocacy centre that is based in the Creative School at Ryerson University. The CFE serves as a hub for a wide range of activities related to free expression and the public's right to seek, receive, and share information. It works collaboratively with other academic institutions, as well as national and provincial organizations, to promote a better understanding of the importance of freedom of expression in a democratic society, and to advance expressive freedom rights in Canada and abroad.

4. The CFE is guided by an Advisory Board made up of fifteen prominent Canadians: **Faisal Bhabha**, Associate Professor, Osgoode Hall Law School, and Legal Advisor to the National Council of Canadian Muslims; **Jamie Cameron**, Professor Emerita, Osgoode Hall Law School; **Andrew Clement**, Professor Emeritus, and Co-Founder, Identity Privacy and Security Institute, Faculty of Information, University of Toronto; **Brendan De Caires**, Executive Director, PEN Canada; **Ryder Gilliland**, Founding Partner, DMG Advocates LLP, and Past President, Ad IDEM/ Canadian Media Lawyers Association; **David Hughes**, Executive Director and Managing Editor, Content, CTV News; **Peter Jacobsen**, Partner, WeirFoulds LLP; **Meghan McDermott**, Policy Director, British Columbia Civil Liberties Association; **Shelagh Paterson**, Executive Director, Ontario Library Association; **Toni Samek**, Professor and former Chair at the School of Library and Information Studies, University of Alberta; **Robin Sokoloski**, Director of Organizational Development, Mass Culture/Mobilisation culturelle; **Laura Tribe**, Executive Director, OpenMedia; **David Walmsley**, Editor-in-Chief, The Globe and Mail; **Vershawn Young**, Professor, Black Studies, Communications Arts, University of Waterloo; and **Cara Zwibel**, Director, Fundamental Freedoms Program, Canadian Civil Liberties Association.

B. The CFE’s interest in the issues raised by this Appeal

5. The CFE has a long-standing and significant interest in protecting the free expression rights of individuals who speak out on matters of public interest—including, by safeguarding the ability of individuals to respond to comments or actions of public figures, without being unduly “chilled” by the threat of Strategic Lawsuits Against Public Participation, i.e., “SLAPPs.” For instance, the CFE has previously intervened (as part of a coalition) in this Court’s anti-SLAPP appeal from Ontario, *17044604 Ontario Ltd. v. Pointes Protection Association*, 2020 SCC 22.

6. The issues raised by this Appeal deal with the CFE’s interest in anti-SLAPP laws directly. That is why the CFE seeks to be involved as an intervener before this Court.

C. The CFE’s expertise and experience on anti-SLAPP issues

7. One of the CFE’s priorities has been to help ensure that expression is not inappropriately restricted by SLAPPs. To this end, the CFE has been a strong supporter of anti-SLAPP legislation, in Ontario and across the country, and has spent considerable resources on following, explaining, reviewing, and discussing the impact of Ontario’s anti-SLAPP legislation. In particular, the CFE:

- (a) has closely tracked how the courts have used Ontario’s anti-SLAPP legislation since its enactment;
- (b) has provided periodic updates on Ontario’s anti-SLAPP legislation and its interpretation via the CFE Blog¹;

¹ See, for example, Michael Vonn, “Component Parts of Effective Anti-SLAPP Legislation” (27 March 2017), Centre for Free Expression (Blog), online: <<https://cfe.ryerson.ca/blog/2017/03/component-parts-effective-anti-slapp-legislation>>; Justin Safayeni, “Ontario’s Anti-SLAPP law: off to a good start, but

- (c) has prepared a detailed backgrounder on Ontario’s anti-SLAPP legislation²;
- (d) has held a public workshop on the subject of Ontario’s anti-SLAPP legislation and has posted a podcast of the workshop on its website³;
- (e) has organized meetings, in conjunction with the Parkland Institute, to educate major NGOs in Alberta about Ontario’s anti-SLAPP legislation and to help them advocate for similar anti-SLAPP legislation in Alberta;
- (f) has conducted outreach with NGOs in Nova Scotia to familiarize them with Ontario’s anti-SLAPP legislation and to help them advocate for similar anti-SLAPP legislation in Nova Scotia; and
- (g) has intervened in a seminal anti-SLAPP case from Ontario, *17044604 Ontario Ltd. v. Pointes Protection Association*, 2020 SCC 22, as outlined above.

D. The CFE’s expertise and experience on freedom of expression issues

8. The CFE is actively involved in issues concerning the protection and promotion of free expression rights more broadly. In addition to the *Pointes Protection* appeal before this Court, the CFE has been granted intervener status, either as part of a coalition or individually, in several

important concerns remain” (29 May 2017), Centre for Free Expression (Blog), online: <<https://cfe.ryerson.ca/blog/2017/05/ontario%E2%80%99s-anti-slapp-law-good-start-important-concerns-remain>>; Justin Safayeni, “The Supreme Court’s judgments on Ontario’s anti-SLAPP legislation: Seven key takeaways” (21 September 2020), Centre for Free Expression (Blog), online: <<https://cfe.ryerson.ca/blog/2020/09/supreme-court%E2%80%99s-judgments-ontario%E2%80%99s-anti-slapp-legislation-seven-key-takeaways>>.

² Centre for Free Expression, “Anti-SLAPP Legislation: A Backgrounder,” online: <<https://cfe.ryerson.ca/key-resources/guidesadvice/anti-slapp-legislation-backgrounder>>.

³ Centre for Free Expression, “CFE Anti-SLAPP legislation workshop,” online: <<https://cfe.ryerson.ca/events/cfe-anti-slapp-legislation-workshop>>.

recent cases—most of which focus on freedom of expression and related issues—before this Court and others. These cases include:

- (a) *Attorney General of British Columbia v. Council of Canadians with Disabilities*, SCC File No. 39430 (public interest standing);
- (b) *National Council of Canadian Muslims v AG Canada*, 2022 FC 324 (academic freedom);
- (c) *Gordillo et al. v. Canada (Attorney General)*, 2022 FCA 23 (statutory interpretation);
- (d) *Attorney General for Ontario v. Information and Privacy Commissioner and Canadian Broadcasting Corporation*, 2020 ONSC 5085 and 2022 ONCA 74 (access to information);
- (e) *Toronto (City) v. Ontario (Attorney General)*, 2021 SCC 34 (freedom of expression in municipal elections);
- (f) *Canadian Broadcasting Corporation v. Manitoba*, 2021 SCC 33 (open court principle);
- (g) *Canadian Federation of Students v. Ontario (Colleges and Universities)*, 2021 ONCA 553 (freedom of expression);
- (h) *Working Families Ontario v. Ontario*, 2021 ONSC 7697 (*Charter* override in the context of election advertising); and
- (i) *R. v. Vice Media Canada Inc.*, 2018 ONCA 53 (freedom of press).

9. The CFE has undertaken numerous initiatives related to the freedom of expression. These include, but are not limited to:

- (a) The carrying out and publication of a national survey of writers and journalists about the impact of mass surveillance on their work⁴;
- (b) The publication of a curated bulletin of news reports and commentary about free expression, as chosen by the Book and Periodical Council's Freedom of Expression Committee⁵;
- (c) The maintenance of a searchable, public database of cases on freedom of expression in the workplace⁶;
- (d) The maintenance of a searchable, public database of Canadian public library policies on intellectual freedom⁷;
- (e) The publication of an online resource on civil liberties and individual rights⁸; and

⁴ Centre for Free Expression, Pen Canada & the Canadian Association of Journalists, "Chilling Free Expression in Canada: Canadian Writers' and Journalists' Views on Mass Surveillance" (November 2016), online:

<https://cfe.ryerson.ca/sites/default/files/Chilling_Free_Expression_in_Canada_FINAL_NOV_9_2016.pdf>.

⁵ See online: <<https://cfe.ryerson.ca/key-resources/bpc-bulletins>>.

⁶ See online: <<https://cfe.ryerson.ca/key-resources/databases/freedom-expression-work>>.

⁷ See online: <<https://cfe.ryerson.ca/key-resources/databases/public-library-policies-database>>.

⁸ See online: <<https://cfe.ryerson.ca/key-resources/guidesadvice>>.

- (f) Presentations to the House of Commons Committee on Justice and Human Rights (Bill C-51, October 23, 2017)⁹; the Senate Committee on Legal and Constitutional affairs (Bill C-51, June 14, 2018)¹⁰; the House of Commons Committee on Government Operations and Estimates (The Public Servants Disclosure Protection Act, February 9, 2017)¹¹; the Alberta Standing Committee on Resource Stewardship (February 4, 2021)¹²; the Consultation Panel on the Political Activities of Charities (December 7, 2016)¹³; and the Treasury Board of Canada's Review on the Access to Information Act (July 26, 2021).¹⁴

10. The CFE has also hosted many events to educate the public about free expression and its importance in a democratic society. These include, but are not limited to:

- (a) A live teleconference with Edward Snowden, followed by a panel discussion moderated by Anna Maria Termoniti on journalists' free expression in the era of mass surveillance.

⁹ Canada, Parliament, "Bill C-51, An Act to amend the Criminal Code and the Department of Justice Act and to make consequential amendments to another Act," 42nd Parl, 1st Sess, No 71 (23 October 2017) at 1540 (Jamie Cameron).

¹⁰ Canada, Parliament, "Bill C-51, An Act to amend the Criminal Code and the Department of Justice Act and to make consequential amendments to another Act," 42nd Parl, 1st Sess, No 47 (14 June 2018) at [NTD: Insert] (James Turk).

¹¹ Canada, Parliament, "Review of the Public Servants Disclosure Protection Act," 42nd Parl, 1st Sess, No 69 (14 June 2018) at 955 (David Hutton).

¹² Alberta, Legislative Assembly, "Review of the Public Interest Disclosure (Whistleblower Protection) Act" 30th Leg, 2nd Sess (4 February 2021) at [NTD: Insert] (David Hutton).

¹³ Canada, Consultation Panel on the Political Activities of Charities, *Report of the Consultation Panel on the Political Activities of Charities* (31 March 2017), online: <<https://www.canada.ca/content/dam/cra-arc/migration/cra-arc/chrts-gvng/chrts/cmmnctn/pltbl-ctvts/pnlrprt-eng.pdf>>.

¹⁴ For more information, see <<https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/reviewing-access-information/the-review-process/ati-review-interim-what-we-heard-report.html>>.

- (b) A talk by Andrew Clement titled, “Our State is Watching Us: Mass Surveillance and Free Expression in Canada after Snowden.”
- (c) A conference titled, “Flying Blind – Limits on the Public’s Ability to Know,” in which experts addressed interference with the creation of information, limitations on access to information, and what could be done to enhance the public’s “right to know.” Speakers included the Information Commissioner of Canada, the former Chief Statistician of Canada, several of Canada’s leading investigative journalists, one of Canada’s top media lawyers, and myself.
- (d) A panel discussion on the implications of Bill C-51 for freedom of expression and civil liberties in Canada. I moderated the panel, which was made up of John Ralston Saul and Monia Mazigh.
- (e) A talk by Len Findlay on the terrorist attacks in Paris and its implications for free expression.
- (f) A panel discussion on secrecy and the public’s right to know about reports of investigations into police behaviour. Speakers included Pascale Diverlus, Julian Falconer, David Goodis, Joanne Mulcahy. The moderator was Mark Kelley.
- (g) A panel discussion on how corruption, impunity, and censorship from both drug cartels and the government eroded press freedom and freedom of expression in Mexico. Speakers were Luis Horaico Nájera and James Cullingham.

- (h) A panel discussion on the importance of “whistleblowing,” and what could be done to protect whistleblowers and the public. Speakers were Sandy Boucher, David Hutton, and Anna Meyers. The moderator was Paul Kennedy.
- (i) A talk by Ken Rubin on access to information rights, what barriers journalists and the public face, and how to overcome them.
- (j) A panel discussion on censorship in the arts. Panelists included Anielika Sykes, Tim Elder, and Hooley McLaughlin. The moderator was Paul Kennedy. The event was subsequently broadcast on *CNC Ideas*.
- (k) A panel discussion on the future of investigative journalism. Panelists were Rob Cribb and Patti Sonntag. The moderator was Lisa Taylor.
- (l) A lecture by Nadine Strossen titled, “Countering Hate Speech.”
- (m) A panel discussion on police surveillance and civil liberties. Panelists included Bill Dunphy, Evan Light, and Brenda McPhail. I served as the moderator.
- (n) A talk by Len Findlay about the defunding of student organizations on University campuses, and its implications for free expression.
- (o) A panel discussion on foreign governments’, specifically China’s, attempts to shape expression in Canada. Speakers were Cheuk Kwan, Sanjay Ruparelia, and Jan Wong. The moderator was Lisa Taylor.
- (p) A talk by Danielle S. McLaughlin on the free expression rights of children.

- (q) A panel discussion on the government funding of journalism. Moderated by Karim Bardessy, the panelists were Ed Greenspon, April Lindgren, and Andrew Potter.
- (r) A film series between 2018-2019 where 8 films related to repression, dissent, and freedom of expression was screened and discussed.
- (s) A panel discussion on the limits to free expression in the workplace. Speakers were David Hutton, Danielle McLaughlin, and Charles Smith. I served as the moderator.
- (t) A panel discussion on cancel culture, censorship, and free expression, which I moderated. Panellists included Piers Benn, Christina de Castell, Inaya Folarin-Iman, and Eric Lybeck.
- (u) A panel discussion titled, “Ag-Gag Law and the Public’s Right to Know.” The moderator was Cara Zwibel, and the speakers were Robert Cribb, Jodi Lazare, and Richard Moon.
- (v) A panel discussion titled, “Pressured to be Silent: Workers, COVID & the Cost for Society,” with speakers, Kit Andras, Syed Hussan, Gagandeep Kaur, and Deena Ladd. Myer Siemiatycki was the moderator.
- (w) A panel discussion titled, “Publication Bans v. Press Freedom & Open Courts.” The speakers were Ryder Gilliand, Alyshah Hasham, Paul Schabas, and Alexi Wood. The moderator was Justin Safayeni.
- (x) A talk by Jameel Jaffer on how democracies should regulate speech online. Mr. Jaffer was in conversation with Andrew Clement.

- (y) A talk by Tamir Israel on whether privacy laws can counter mass surveillance.
- (z) A talk by Yan Campagnolo titled, “Does Cabinet Secrecy Unduly Undermine Open Government and the Public’s Right to Know.”

E. The CFE’s proposed submissions

11. If granted leave to intervene, the CFE will make submissions on the approach taken by the British Columbia Court of Appeal (“BCCA”) in its interpretation and application of s. 4(2)(b) of the *Protection of Public Participation Act*, S.B.C. 2019, c.3, which sets out the “crux” of the anti-SLAPP analysis, i.e., the “weighing” stage.

12. More specifically, the CFE’s submissions will focus on the following points related to the BCCA’s treatment of the “chilling effect” at the “weighing” stage of the analysis:

- (a) Anti-SLAPP laws create a tension between a plaintiff’s right to have their case heard on the merits, and a defendant’s right to free expression. This Court has struck a delicate balance between these interests in *Pointes Protection*. The BCCA’s logic threatens to upend the balance by tipping the scales firmly in favour of plaintiffs in defamation cases—particularly in more routine or pedestrian anti-SLAPP motions arising from a defendant allegedly defaming the plaintiff in social media exchanges or on an online platform.
- (b) The BCCA misunderstood and misapplied the “chilling effect” as a factor in the “weighing” stage of the anti-SLAPP analysis. The “chilling effect” is intended to address the concern that litigation (or the threat of litigation) by the plaintiff would “chill” the expression of the defendant or those similarly situated, thereby having a

negative impact on overall free expression and public discourse. By contrast, the BCCA uses the “chilling effect” in exactly the opposite way—to strengthen the hand of plaintiffs to *pursue* their claim, based on the theory that they will withdraw from public debate due to fear of reputational harm unless they are able to bring such litigation. Turning the “chilling effect” consideration on its head in this way—effectively as a sword, rather than a shield—provides plaintiffs with a powerful new tool for pursuing defamation cases and risks significantly weakening the impact of anti-SLAPP laws.

- (c) The BCCA’s approach to the “chilling effect” is at odds with the judicial approach taken in Ontario (which has substantially identical anti-SLAPP legislation), where the courts have recognized that when a plaintiff chooses to “inject themselves into public debate over a contentious topic, they must expect that they are going to be met with some measure of rebuttal, perhaps forceful rebuttal, by those who take an opposite view” (*Levant v DeMelle*, 2022 ONCA 79, at para 70). Courts in Ontario have dismissed such claims by plaintiffs, who have effectively “jumped into the turbulent river of [social media] commentary... got it back as good as [they] gave it, and got wet in the process” (*Mondal v Evans-Bitten*, 2022 ONSC 809, at para 41). The Ontario approach better reflects the purpose and the spirit of anti-SLAPP legislation, and is to be preferred.
- (d) The BCCA approach fails to offer any kind of guidance on when the “chilling effect” would weigh in favour of allowing a plaintiff to continue their case. Even if there was some room for the “chilling effect” to support such an outcome (which the CFE does not accept), it should only be done in the rarest of cases. Certainly

not where a plaintiff engages with harsh rhetoric on a social media platform known for same, and where the plaintiff and defendant are both public figures exchanging views on a matter of public interest.

13. If granted leave to intervene, the CFE will also argue that the BCCA's approach at the "weighing" stage failed to properly consider the impact of the "mob" dynamic commonly found on social media platforms. In particular:

- (a) Where defamation lawsuits are brought against a single defendant, but the alleged defamatory impact is the result of comments made by a wide network of individuals (*e.g.* on social media), this is a relevant factor that the courts must weigh heavily in the balance. The BCCA erred in its decision to ignore this factor and/or to deem it irrelevant.
- (b) Where a social media "mob" echoes, amplifies, and makes similar comments about a plaintiff in response to that plaintiff's original commentary, this should normally weigh against allowing the plaintiff to continue their claim against one particular defendant, unless the plaintiff can show that the defendant played some outsized or material role in contributing to their overall alleged harm.
- (c) Anti-SLAPP motions require a realistic assessment, albeit on a limited record, of whether, and to what extent, a plaintiff suffered harm as a result of the defendant's conduct. A plaintiff who has been subject to negative commentary from numerous individuals and/or entities cannot properly rely on the entirety of the resultant harm to justify their claim against a single defendant for the purposes of the "weighing" analysis.

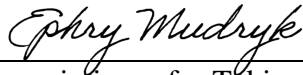
- (d) The “weighing” analysis should account for a plaintiff’s choice to use harsh rhetoric on harsh social media platforms, in circumstances where the plaintiff knew or ought to have known that a “mob” dynamic could result.

F. Conclusion

- 14. If granted leave to intervene, the CFE will work with counsel for the parties and counsel for the other interveners (if any) to ensure that our submissions are not duplicative.
- 15. The CFE does not seek leave to file any new evidence and would rely entirely on the record as it has been created by the parties.
- 16. The CFE would seek no costs and would ask that no costs be awarded against it.
- 17. The members of the CFE have consistently endeavoured to provide this Court (and others) with helpful and distinct submissions when granted intervener status on previous occasions, and would endeavour to do the same in this Appeal should this Court grant leave.

18. This affidavit is made in support of a motion by the CFE for leave to intervene in this Appeal, as well as to file written submissions and to present oral argument through counsel at the hearing of this Appeal.

SWORN by James L. Turk of the City of Toronto,
in the Province of Ontario before me at the City of
Toronto, in the Province of Ontario, on April 26,
2022 in accordance with O. Reg. 431/20,
Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits
(or as may be)



James L. Turk

JAMES L. TURK

**EPHRY MUDRYK, a Commissioner, etc.,
Province of Ontario, for Stockwoods LLP,
Barristers and Solicitors.
Expires November 7, 2024.**

EPHRY MUDRYK