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or to which paragraph are you referring?

261 Q- To a timeframe.

A- Okay.

262 Q- Okay.

On July twenty-sixth (26th), were -- you considered yourself still an employee of the CFS-Q?

A- It was my understanding that Mahdi and Nina did not consider me that, but that I still thought that was -- there was some confusion in there, and so I was still willing to -- I still thought there was -- that I was likely still an employee, yes.

263 Q- Okay.

At paragraph 59 -- paragraph 58, excuse me -- you say that:

"Defendant Amrov circulated an e-mail on July twenty-sixth (26th), two thousand and seven (2007), calling for an Executive Committee on August two (2), two thousand and seven (2007)."

And you talk about that e-mail at P-13.

A- Yes.

264 Q- Who showed you that e-mail?

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A- The first time I saw this e-mail was when it was submitted as evidence.

265 Q- Okay.

A- I think. Let me just look -- I'm not listed, am I? Did she accidentally send it to me? I think -- I believe there was an e-mail sent to me after I was fired, I don't remember when it was. But I'm not listed on this, so...

Me ROSELINE OUELLETTE:

Okay.

Me WILLIAM DE MERCHANT:

Continue. Okay.

A- Yes, as far as I recall, the first time I saw it was when it was...

266 Q- In paragraph 59...

A- Yes.

267 Q- ... when did you learn that the lock had been changed on August (sic) twenty-sixth (26th)?

A- The exact date I learned in speaking to the locksmith. Later, when we went to change them again -- I don't remember what date that was.

268 Q- How did you learn that they had been changed on July twenty-sixth (26th)?

Me ROSELINE OUELLETTE:

He already answered the question.

Me WILLIAM DE MERCHANT:

No, I asked...

Me ROSELINE OUELLETTE:

He just said...

Me WILLIAM DE MERCHANT:

... him when the -- oh, maybe.

Me ROSELINE OUELLETTE:

Yes, he answered.

Me WILLIAM DE MERCHANT:

You're right. Okay.

269 Q- So, okay, you talk about Exhibit P-14. This is  
an invoice. Do you recognize the signature  
there on this?

A- Yes.

270 Q- Who is it?

A- Mahdi Altalibi.

271 Q- Okay. How did you get that invoice?

A- The locksmith.

272 Q- The locksmith gave it to you? When did he do  
that?

A- I'm sorry, you'll have to just give me a minute.  
I'm sorry, I'm just having a hard time  
remembering exact dates right now.

273 Q- Yes. On what occasion did he give you that?

A- I don't want to mis-speak, because I'm having a

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hard time remembering exactly the number of times the locks were changed.

Me ROSELINE OUELLETTE:

We can take an undertaking, if you want.

Me WILLIAM DE MERCHANT:

No, I'm asking him when...

A- It was...

274 Q- ... to his recollection, it was given.

Me ROSELINE OUELLETTE:

Okay, recollection.

Me WILLIAM DE MERCHANT:

Yes.

A- It was on an evening where I had the locks changed with the locksmith, I'm just having a hard time remembering the exact date of that. And, so, I think it's in -- I think it's in my Affidavit somewhere, I just don't recall where. It's in my Affidavit -- I believe that was August fourth (4th).

275 Q- To the best of your -- it would be on...

A- To the best of my recollection, I believe that was August fourth (4th), when I had the locks changed that day.

276 Q- Okay. Why did he give you that invoice?

A- I don't know.

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277 Q- He offered it? You asked for it?

A- I can't speak to his motives.

278 Q- Did you ask for it?

A- He offered it.

279 Q- He offered it.

Could you tell me who is that locksmith?

A- It's listed on the bill.

280 Q- Okay.

A- I don't remember the exact conversation, I just remember that he had it.

281 Q- Okay. But you're saying that you did not ask for it?

A- I don't remember the exact conversation. I don't...

282 Q- No, you don't remember? A while ago you said that he offered it.

A- I did not think to ask for a bill I didn't know existed. He first brought it up. I don't remember the exact process by which I...

283 Q- Yes.

A- ... received it.

284 Q- Well, explain -- explain what you remember.

A- I remember him saying that he had...

285 Q- Yes.

A- ... a bill, he was showing me the bill, and then

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I had the bill. I don't remember the conversation in which -- I don't remember if he was, like, "You should have this," or what happened.

286 Q- Okay.

A- I believe with this one, he had some concerns about how it would be paid. And, so, I don't remember how that process continued.

287 Q- Did he tell you that that was paid -- that was not paid?

A- He had concerns. He recognized the locks had been changed now three (3) times in a short period of time, asked about being paid. I said "I don't know we had the bill," and then so how that got handed to me, I don't recall, but that's, I think, how the conversation started, making sure that he would be paid, and it would be paid in due course.

288 Q- Did he tell you that that hadn't been paid?

A- I don't recall exactly what he said.

289 Q- Okay.

Okay, before August fourth (4th), you said that there was three (3) or maybe four (4) keys going around; there was a key to Madame Carlyle, there was a key to Mr. Silvershine...

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A- Rosenstein -- or Rosen...

290 Q- Excuse me, Rosenshine?

A- Rosenshine, there we go. You've got me confused now.

291 Q- And one (1) key to you, and that there had been another key going around?

A- No, there was one (1) additional spare key that was in the drawer.

292 Q- Okay.

A- And then -- because that key had come from the vacant position of the Chairperson from -- prior to June nineteenth (19th). And then I -- I don't recall for sure, there may have been a fifth -- or, yes, there may have been a fifth, I don't recall.

293 Q- And that fourth key that was in the office, why didn't you give it to Nina or Mahdi?

A- I believe Margaret had that key.

294 Q- Margaret...

A- Margaret Carlyle. I believe she is the one that recovered the key from the previous Deputy Chairperson, and I don't...

295 Q- Okay, so she had two (2) keys with her?

A- That's my recollection.

296 Q- Now, after the keys were first changed on July

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fourth (4th), who had keys to the office?

A- On July fourth (4th)?

297 Q- Yes.

A- I did. Mahdi and Nina both certainly did. And I believe there was one (1) other key.

298 Q- That was...

A- That was kept in the drawer.

299 Q- Okay. So, there was four (4) keys?

A- Yes.

300 Q- And three (3) of those keys were held by Nina and Mahdi?

A- Two (2) of those keys, one (1) each.

301 Q- And one (1) was in the office?

A- That's correct.

302 Q- Who had access to the office?

A- Well, the door was open, so anybody at any time when people are in, I suppose.

303 Q- Okay. You're saying at your paragraph 59 that:

"By changing the lock, they were  
seizing control of the office."

Seizing control from who?

A- Well, they were making sure that they were the only ones with keys to the office.

304 Q- Who else had a key?

A- I don't know for whom else they made a key.



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305 Q- You had a key?

A- Oh, you mean beforehand?

306 Q- Yes. Because you said they were "seizing control."

A- Yes.

307 Q- From whom were they seizing control?

A- Well, in part from myself.

308 Q- Okay.

A- And also from whoever else they may have given that key to. And I believe that -- I had mentioned that Mahdi had told the National Deputy Chairperson, Brent Farrington, when he was working, that he could have the other key.

309 Q- Okay. You're saying in your paragraph 60 that:

"On July twenty-seventh (27th), Angelica Novoa notified all members, local organizations, that the C.S.U. would be submitting to the Special General Meeting scheduled on the third (3rd) of two thousand and seven (2007), the matter of removal of the Defendants Amrov and Altalibi."

You find that...

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A- That's P-15.

310 Q- P-15, yes.

When did you first see that e-mail?

A- It was sent to me, and I was out of town, I was actually travelling, but -- so, I don't recall when I first read it, but, as you can see, it was sent to me.

311 Q- Okay.

A- That's not my proper e-mail address, but that was...

312 Q- What is your address?

A- organizer@cfs-fca.qc.ca.

313 Q- Okay.

A- It's spelt here with a "Z".

314 Q- Okay.

A- So if I send e-mails, it's...

315 Q- Okay, that's you?

A- But that forwards the -- yes.

316 Q- Okay.

A- A lot of people think they're American, so they spell it wrong.

317 Q- Okay.

A- So it's a direct forward. I would have -- that would have been in my e-mail box on the twenty-seventh (27th), I don't recall what day

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I read it.

318 Q- Okay.

At P-16 -- Exhibit 16, again we see that you received that e-mail, that's...

A- That's correct.

319 Q- Okay.

A- Again, I can't speak to when I first read it, but that would have been in my e-mail box that day.

320 Q- At -- again, now, it's my English -- 62. What "conspicuously" means?

A- It's noticeably missing.

321 Q- Okay. What do you mean by that?

A- I mean it's not there.

322 Q- You're just saying that it's not there?

A- That it wasn't listed, despite clear discussions about how that was intended to be included. Roland Nassim had made that clear at the Executive Committee meeting at which -- on the twenty-fourth (24th). Angelica and the rest of the C.S.U. was very clear, and they wanted that included.

323 Q- On the twenty-fourth (24th)?

A- Yes.

324 Q- Okay. You were there?

A- On July twenty-fourth (24th).

325 Q- When did they say that they wanted to be there?

A- There was plenty of discussion before the meeting...

326 Q- Okay.

A- ... all around that, yes.

327 Q- Okay. Okay, 64.

You say that you were not present at the meeting?

A- That's correct.

328 Q- You know that there was a meeting, you had received the e-mail?

A- Yes.

329 Q- Okay. Why were you not present?

A- Because I was informed by the person who called me that I don't -- well, Nina called, but I was informed by Mahdi that I no longer worked for them...

330 Q- Yes, on the...

A- ... so...

331 Q- ... twenty-fourth (24th)?

A- Yes. So...

332 Q- Okay.

A- ... while I wasn't sure what my position was...

333 Q- Yes.

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A- ... I understood their position, and didn't want to do anything to add conflict until I was more clear on where we stood.

334 Q- Okay. And did you discuss with anybody your presence to that meeting?

A- I'm sorry, I don't understand your question.

335 Q- Did anybody ask you to be there?

A- I'm sorry, I don't understand what you mean by that.

336 Q- Did Roland Nassim ask you to be there? Did Angelica Novoa ask you to be at that -- did...

A- I don't recall.

337 Q- Did anybody from C.S.U. or P.G.S.S. ask you to be there?

A- I don't recall.

338 Q- Did somebody from the National...

Me ROSELINE OUELLETTE:

He's answered...

Me WILLIAM DE MERCHANT:

Yes, and I'm asking him questions. Yes, I'm very happy that he's answering me.

339 Q- And is there anybody from the National that...

A- I don't recall.

340 Q- ... asked you to be there? You don't recall, or you were not asked?

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A- I don't remember.

341 Q- Okay.

Okay, now, did you talk to anybody, telling them that you would be ready to work for the Federation if you would be rehired?

Me ROSELINE OUELLETTE:

O **Objection, he already told you that he was not rehired, he didn't know his position.**

Me WILLIAM DE MERCHANT:

No, he never told me that he was not rehired. He said that he was rehired.

Me ROSELINE OUELLETTE:

Where?

Me WILLIAM DE MERCHANT:

At the beginning -- completely at -- the first question that I asked him.

Me ROSELINE OUELLETTE:

We'll see in the transcript.

Me WILLIAM DE MERCHANT:

Okay, I'll continue, and I'll come back on this.

342 Q- Who informed you that on August fourth (4th), two thousand and seven (2007), there was a resolution concerning you that was passed?

A- As I answered earlier to anything around August third (3rd), there were several people who told

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me about that.

343 Q- Okay.

A- I don't remember the order in which those phone calls happened.

344 Q- Did anybody contact you concerning your rehirement?

Me ROSELINE OUELLETTE:

O **Objection to...**

A- Following...

345 Q- **... the term "rehirement."**

Me WILLIAM DE MERCHANT:

346 Q- To the motion relating to you.

A- Again, after the meeting, several phone calls were made...

347 Q- Yes.

A- ... and the entirety of those decisions was discussed.

348 Q- Okay. Did anybody ask you if you were ready to work for the Federation?

Me ROSELINE OUELLETTE:

O **Objection.**

Me WILLIAM DE MERCHANT:

349 Q- On August fourth (4th), two thousand and seven (2007) -- paragraph 65:

"In accordance with the

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resolution unanimously passed at the Special General Meeting... I retained the service of a locksmith and had a new lock placed on the door of the CFS-Q office."

Who contacted you to tell you to do this?

A- It was the same list of people in that entire -- after that meeting, several people called me and told me what happened in the meeting. Some of those people told me that also the locks needed to be changed.

350 Q- Okay. Did you tell them -- those persons, that you did not work for the Federation, anymore?

A- No, I was informed that the title had been changed and that I was still to work there, and so...

351 Q- Are you objecting to his answer?

Me ROSELINE OUELLETTE:

No. Mais...

Me WILLIAM DE MERCHANT:

352 Q- Did you go to see this -- this is the same locksmith that we just saw the invoice, that you contacted?

A- That's correct, he's the one that was



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recommended by our superintendent.

353 Q- Did he tell you why he was concerned that he would not be paid?

Me ROSELINE OUELLETTE:

O ~~Objection, it's irrelevant.~~

Me WILLIAM DE MERCHANT:

Well, it's his answer a while ago, he said that...

Me ROSELINE OUELLETTE:

Yes, I know, but he already answered the questions.

Me WILLIAM DE MERCHANT:

He never answered that question.

Me ROSELINE OUELLETTE:

Yes.

Me WILLIAM DE MERCHANT:

354 Q- Now, when you changed the lock, how many keys were made?

A- My recollection is four (4), but it may have been five (5). But I believe I made -- I'm trying to remember. I don't recall exactly. And that's something that would be on the bill, so we could -- whatever that word is...

355 Q-U ~~Could you give us the bill of...~~

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Me ROSELINE OUELLETTE:

Yes.

Me WILLIAM DE MERCHANT:

Okay.

356 Q- Who paid for that change of lock?

A- That stayed on the account, so -- we're allowed to carry a bill with these people, so, like, he gave me a bill, and that wasn't paid.

357 Q- Okay. Is that bill paid to this day?

A- I believe that our landlord was taking care of that, our superintendent.

358 Q- Okay, you think the landlord...

A- I think it's covered by the landlord.

359 Q- ... the landlord paid for the lock change?

A- Yes.

(DISCUSSION OFF RECORD)

(RECESS)

Me WILLIAM DE MERCHANT:

360 Q- Okay, so on August fourth (4th), two thousand and seven (2007), you retained the services of a locksmith, with a new lock placed on the door of the CFS-Q.

My question was, who -- how many keys were

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made and who were they given to?

A- And the answer was that we'll get the bill to find out how many keys were made.

361 Q- Okay.

Me ROSELINE OUELLETTE:

Yes, we have already an undertaking.

Me WILLIAM DE MERCHANT:

362 Q- Okay, you don't remember how many persons?

A- That's what I said.

363 Q- Okay. Perfect, okay.

A- It's four (4) or five (5), but I don't remember.

364 Q- Okay.

A- It's listed also in the motion -- it's what I was trying to refer to you.

365 Q- Now, you're saying that you did remove the chequebook?

A- Well, it's a box of cheques.

366 Q- Hmm?

A- It's a box. It's not a chequebook, it's a box with cheques in it, that goes into the computer and are printed up.

367 Q- Okay, it's a box.

A- Just to be -- I mean, I'll use the same language that had been used, but it's a better term.

368 Q- What was in that box?

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A- Blank cheques.

369 Q- That was all?

A- Yes.

Oh, there was some voided cheques, as well.

370 Q- Voided cheques?

A- Yes, like from the past when we had to void a cheque for whatever reason.

371 Q- What is a -- again, my English -- what is a "voided" cheque?

A- Well, if you have a cheque that you don't want to cash anymore, you write "Void" across it...

372 Q- Okay.

A- ... and then they can't cash it.

373 Q- Okay.

A- Another example of what happens in our office from time-to-time is -- because we only have one (1) printer and a fax machine, so if I'm preparing cheques and I put the cheque paper in, and then a fax comes in...

374 Q- They get voided.

A- It's awesome.

375 Q- Okay.

A- So, they were folded up in there, as well.

376 Q- Okay. Was it the only thing that you took from the office?

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A- I also removed some ISIC cards. International Student Identity Cards.

377 Q- ISIC cards. Okay. Anything else?

A- No.

378 Q- Okay. Was there any cheques written with that chequebook?

A- Okay, one of the reasons that I took it -- and, sorry, it might be -- there was -- I checked on the -- the other thing I did is, I checked on the computer, we have a computer program that we keep our accounting on, as well as -- that's how we print cheques, to record them. There was -- there were five (5) cheques missing from the last recorded one electronically, and the first cheque in the box.

So, that's when I realized that there was no -- there was a problem, because there were five (5) cheques missing. So, that's also what more motivated me to take the box, just to make sure that no more cheques were -- so I don't know what happened to those five (5) cheques...

379 Q- Okay.

A- ... but there's -- no cheques have been written since I took the box.

380 Q- Was there any cheques that were signed blank

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when you took it?

A- Oh, sorry, one (1) other thing that I took -- sorry, I forgot that -- is that there was an envelope with a cheque in it that was to be -- to pay a bill, that I took and mailed.

381 Q- So, you took another...

A- A sealed envelope. It had been signed, I don't recall when -- late May, early June. It hadn't been mailed. When Nina asked me not to put through any cheques, I held off on mailing -- I explained that there were -- in addition to my salary, there was also a number of bills that we needed to pay, and she said that she still didn't want anything to go through. So rather than start a conflict, I agreed to that.

382 Q- So, you took, also, a sealed envelope?

A- Yes.

383 Q- How did you know there was a cheque inside of it?

A- Because I had prepared the envelope.

384 Q- Okay. Where was that?

A- On my desk.

385 Q- On your desk. Okay.

A- Or the desk by the front door.

386 Q- Okay. Who signed that cheque that was in the

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sealed envelope?

A- I honestly don't recall. Yes, I don't recall.

387 Q- When was that cheque made?

A- Again, it was sometime in May, I believe.

388 Q- Okay. Who were the signing officers in May?

A- Well, our understanding, and what we had agreed with the bank was that it was Justin Levy, Margaret Carlyle, and myself.

The bank, following what -- the legal proceedings, and all the things going on with the bank, it would appear that they hadn't eliminated all the signing authorities that we had intended on eliminating and hadn't transferred all that. But that's how we were operating for the previous -- I think -- since January, I believe.

389 Q- But you're saying to me that this envelope was prepared in May?

A- Yes.

390 Q- By whom?

A- By myself.

391 Q- Okay, so you must know who were signing cheques at that time?

A- Two (2) of Margaret Carlyle, Justin Levy, or myself.

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392 Q- Okay, one (1) of -- two (2) of...

A- Two (2) of those three (3).

393 Q- Okay.

A- I don't recall which two (2).

394 Q- When you went to change the lock on the fourth (4th) of August, what time was that that you went to change the lock?

A- It ended up being quite late on the Saturday. I called our -- well, I guess we had gone to try and get into the office -- or I had gone, and realized my key didn't work, and then I called our superintendent -- it was Friday evening by this time -- somewhere in the five or seven o'clock'ish (17:00 - 19:00) range.

I called our superintendent a number of times, got hold -- or found a bill that I had had -- or found the number for the locksmith somewhere, called the locksmith -- well, it was kind of going back and forth. I finally got a hold of a staff person that works for the superintendant, who assured me the locks had not been changed, so I checked again, the locks had been changed. Because he said they wouldn't have been changed without his knowledge. So, I checked again, they had been changed.



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I called the locksmith, I believe it was somewhere around a quarter after seven (19:15) on Friday evening, the locksmith informed me that he observes the Sabbath and said that he wasn't available, then, like, after about fifteen (15) minutes past our conversation he would no longer be available until, I believe -- and, sorry for my ignorance of the Jewish religion, I don't remember if it was seven thirty (19:30), or nine thirty (21:30), or whatever it was on Saturday.

And I said, "So you're telling me that you'll be available then, and that's a perfectly acceptable time for you to come?" And he said "Yes. I can't do it now, but tomorrow, Saturday night" -- I don't recall the time -- "that's fine by me."

395 Q- Okay.

A- So at his earliest convenience on Saturday, which admittedly did end up being quite late.

396 Q- Okay. So, that was on the -- August fourth (4th)?

A- Is that the Saturday?

397 Q- If you have a calendar, check your...

A- Okay.

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Yes, and then it went through to very, very early morning.

398 Q- Okay.

A- Technically on Sunday. It was past -- it did go through -- or past midnight (24:00) on the Saturday night, so Sunday morning.

399 Q- Okay. What time did you go?

A- Well, by the time I called the locksmith -- it was, I believe, after nine (21:00) by the time he got back to me, and then -- so by the time he got there it was well after ten (22:00), and then he had to do some drilling in order to...

400 Q- Okay.

A- ... get the lock -- and so it took some time.

401 Q- Okay. The fourth (4th) or maybe fifth (5th) of...

A- Well, if it was the fifth (5th), it's, like, one a.m. (01:00)...

402 Q- Yes.

A- ... twelve thirty (12:30), kind of thing.

403 Q- In that range, okay.

A- But it certainly started the evening before -- or the -- yes, evening before.

404 Q- On the sixth (6th) of August you found out that the lock had been changed again?

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A- Yes.

405 Q- How did you find that out?

A- Because I went to the office.

406 Q- Okay. So, what did you do then?

A- I knocked on the door...

407 Q- Yes.

A- ... and asked to be allowed in.

408 Q- Yes.

A- And then I -- I knew that Mahdi had gone in, because I saw him walking in the office. I asked to speak to him, and he refused.

409 Q- Okay.

A- So, then I left.

410 Q- Okay. So, you went to the office on the sixth (6th) and you saw -- you spoke with Mahdi?

A- I believe that was the day. The sixth (6th), seventh (7th), eighth (8th) were busy, and that, and trying to go to the bank, and that kind of thing, and I don't recall exactly what days everything happened, and what time, but it was either the sixth (6th) or the seventh (7th), because in the morning when I went in -- and we found out -- I believe the exact date was given through testimony of your clients, and it was how we found out the exact date for sure.

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411 Q- Okay. Okay.

So, you don't recall exactly. But when you went over there, you found out that the key has been changed, you knock on the door, and you spoke with Mahdi?

A- Yes.

412 Q- Okay. What did you speak about with Mahdi?

A- Nothing, he didn't respond.

413 Q- What did you ask him?

A- To let me in, so we could talk.

414 Q- Yes.

A- And I asked him why he was in the office.

415 Q- Okay. Okay. And he didn't talk?

A- No response.

416 Q- No, okay.

Now, on August eighth (8th), you went to the office at nine p.m. (21:00) to have the lock changed again. Why at nine p.m. (21:00)?

A- Again, I called the locksmith, I believe sometime in the late afternoon -- it was sometime around three (15:00), and he had said that he was on a call and would be available around five (17:00). He asked me if I was in a hurry to get it done, and if it had to be done at five o'clock (17:00).

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417 Q- Yes.

A- And I said that -- whatever was most convenient for him that evening. He said he didn't like rush hour -- to park on de Maisonneuve during rush hour, he found that complicated, and then said that he had other commitments, but asked me if it would be convenient with me or fine by me to meet him at nine (21:00).

418 Q- Why that night? Why shouldn't it have waited business hours next day?

A- It was because he also was occupied, and -- he had no problem with working in the evening, so he said that was the most convenient, and I...

419 Q- Okay.

A- ... didn't see it as a problem.

420 Q- Okay. Is it the same price, night or day?

A- I actually am not entirely sure.

421 Q- Okay. On the eighth (8th) of August, who made the decision to have the lock changed again?

A- It had been made clear to me by members of the majority of...

422 Q- Who contacted you to tell you to change the lock?

A- Again, I spoke to Shanice, or -- Shanice from Dawson Students Union, and other members there

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of the Executive Committee. I spoke to Soshima,  
Melanee Thomas, Roland Nassim, Erica Jabouin...

423 Q- Who's the first one?

A- ... and Justin Levy. I don't recall.

424 Q- You don't recall. Okay.

Was there a decision of the -- did you ask  
for a resolution of the Executive Committee to  
have the key changed?

A- No, I was still working based on -- and as were  
-- they were directing me, was based on the  
motion passed at August third (3rd).

425 Q- Okay. In paragraph 67 you say that:

"On August sixth (6th), the lock  
of the office was again changed  
without authorization of either  
me or the Executive Committee."

Do you have -- did you have the power to  
authorize a change of lock?

A- As per the resolution, I think it was asked that  
I change the lock, so...

426 Q- Yes. But here you say that Mahdi changed the  
lock on August sixth (6th) without an  
authorization of you. Did you have the  
authority to give that power -- that  
authorization to change the lock?

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Me ROSELINE OUELLETTE:

He already answered. He...

Me WILLIAM DE MERCHANT:

I did not understand what he said.

Me ROSELINE OUELLETTE:

Yes, he answered the question.

Me WILLIAM DE MERCHANT:

I'm asking him to repeat his answer.

A- Based on the motion, I was the one that was asked to change the locks...

427 Q- Yes.

A- ... and I had been directed by the Executive Committee.

428 Q- But -- you had the authority to change the lock, but did you have the authority to authorize the change of lock on the sixth (6th) by Mahdi?

A- I was the one entrusted to change the lock, he had asked us to...

429 Q- Okay. Okay. You were entrusted with that power?

A- Or...

430 Q- Now, was that given to you by telephone? Did you -- were you called in? How did they ask you to change the lock on the eighth (8th) of August?

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A- There were several discussions.

431 Q- On the phone or in person?

A- Both.

432 Q- Explain to me why both. When...

A- I don't understand your question.

433 Q- Okay, when did people start phoning you, telling you to have the -- to change the lock?

A- Well, I called them to tell them that the locks had been changed...

434 Q- Yes.

A- ... after we had changed them.

435 Q- Okay.

A- So, immediately I was told "That's messed up, we should fix that."

436 Q- Okay.

A- And then on further conversations with folks.

437 Q- Okay. Did you have a meeting?

A- I'm sorry, I don't know what you mean by "meeting."

438 Q- Did you meet -- you said that you met some people in person that told you to have the lock changed.

A- Yes.

439 Q- You said both by telephone and by person.

A- Yes.



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440 Q- That's all happening on the eighth (8th)?

A- On or around, between the seventh (7th) and eighth (8th), yes.

441 Q- Okay. You met with whom?

A- Several people.

442 Q- Who?

A- It's too long a list, I don't recall.

443 Q- List me who gave you the power to change the lock.

A- I just did.

444 Q- No.

A- Yes, I did.

445 Q- Not in person.

A- The General Meeting did, all the people that I listed earlier to -- who informed me about the General Meeting motion, and then later, when I spoke to Roland Nassim, I spoke to folks from the Dawson Student Union, I spoke to folks from the Concordia Student Union.

446 Q- But is that on the seventh (7th) and on the eighth (8th) that you met people?

A- Yes, I talked to them, and bumped into them, or whatever, yes.

447 Q- Bumped -- bumped by chance?

A- Or -- partially by chance, partially by, like,

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"Hey, let's go and have -- grab a coffee."

448 Q- Okay. Where were you?

Me ROSELINE OUELLETTE:

O Okay, I will object to those kinds of questions,  
it's irrelevant.

Me WILLIAM DE MERCHANT:

Whew...

Me ROSELINE OUELLETTE:

Yes, it's irrelevant, and don't say "whew."

Me WILLIAM DE MERCHANT:

Don't say "whew"?

Me ROSELINE OUELLETTE:

Yes, it's a 'manque de respect, maître'.

Me WILLIAM DE MERCHANT:

Mais, moi je trouve très pertinente cette  
question-là. Je veux savoir ce qui s'est passé  
cette journée-là.

449 Q- Where did you meet Noah Stewart Ornstein and  
Erica Jabouin that day?

A- For the final time before we went over to the  
office?

450 Q- Yes.

A- Because several times probably before that, and  
I can't say where, because I don't recall -- any  
number of places. The final time it was on the

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seventh (7th) floor of the Hall Building of the  
Concordia University.

451 Q- Okay, so you met them for what reason?

A- In order to go over to change the lock.

452 Q- Okay.

On the fourth (4th) of August, when you  
went in to have the lock changed, with whom were  
you?

A- I was alone.

453 Q- Okay. And why were you accompanied on this  
occasion?

A- I'm sorry, what did you say?

454 Q- Why were you -- did you decide to be  
accompanied?

A- I don't understand "accompanied."

455 Q- With Noah Stewart Ornstein and Erica Jabouin.

A- I'm sorry, I now understand what you were trying  
to say. I was accompanied by them because after  
finding out that the locks had been changed  
again...

456 Q- Yes.

A- ... Erica was interested in making sure that she  
was there. Justin Levy is out of the country,  
and so Erica decided that she would be the best  
person to also be there, and Noah, who was in

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the office also -- in the Concordia Student Union office, also said he wanted to come along.

457 Q- Okay. Both of the...

A- Just to see what the office would look like when I walked in.

458 Q- Okay. Okay.

Now, when you went to the office you found out -- you say at 69 -- that was accompanied with Aaron Donny-Clark, and again, Mr. Fahr Marouf. Okay.

A- I didn't know initially that Aaron was there, I only found that out after.

459 Q- Okay.

A- Fahr spoke through the door, the others didn't speak.

460 Q- And you say, at 70, that while you were there, Altalibi appeared in the company of six (6) other men that aggressively berated you?

A- So, we went up to the door...

461 Q- Yes.

A- ... knocked on the door, there was no response.

Looked under the door, it was dark -- later discovered it's because they had shoved t-shirts under the door to block the light coming through. We knocked again, again no response.

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Our locksmith then went up to the door and went to try it -- because he had said that he had experience with locks going back and forth -- or he had met people with guns or knives on the inside of the door, so he said "Make sure you knock a couple of times, we'll make sure."

So, when he went to the door and prepared his drill, that's when they knocked -- there was a knock back from the inside. Then there was a discussion back and forth, where they -- Erica said that as someone who had been listed as a director of the organization, she wanted access to the office...

462 Q- Yes.

A- ... she should be allowed into the office, and see who else was there, and to discuss what was going on.

They refused her entry, and she said therefore that she was going to get the locks changed, and that's what empowered her to move forward. We heard then, again, a voice that I recognized as Fahr Marouf's voice, saying that they were going to call the police. And Erica said "Then we'll call the police." At which point I went downstairs with the locksmith, who

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had also been accompanied by a young son, to wait for the police to arrive. And Erica and Noah stayed upstairs.

463 Q- Who phoned the police?

A- I did, as well as I don't know who from the other...

464 Q- Okay, you phoned the police?

A- I did.

465 Q- Okay.

A- As directed -- Erica told me she wanted to stay up there, so she had told me to call them, and then sent me downstairs. So, then I went down with the locksmith and his young son, we were sitting outside...

466 Q- What number did you phone to get the police?

A- 9-1-1.

467 Q-U Do you authorize me to go and get the call from 9-1-1?

Me ROSELINE OUELLETTE:

If it's 'disponible'.

Me WILLIAM DE MERCHANT:

Okay.

Me ROSELINE OUELLETTE:

I'm not sure here it's relevant to have the call from the police.

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Me WILLIAM DE MERCHANT:

Crédibilité.

Me ROSELINE OUELLETTE:

O Yes, I know, but I will make -- under reserve of  
an objection.

Me WILLIAM DE MERCHANT:

Okay.

A- That's when I went outside and I was standing  
with the locksmith and his very young son, when  
Mahdi came up -- we stood apart for quite a  
while, and somebody then started to yell at me,  
and stepped closer and closer until the police  
arrived.

468 Q- Now, why did Erica Jabouin call Roland Nassim?

Me ROSELINE OUELLETTE:

O Objection.

Me WILLIAM DE MERCHANT:

To the best of his knowledge.

Me ROSELINE OUELLETTE:

Under reserve.

A- I don't know.

Me WILLIAM DE MERCHANT:

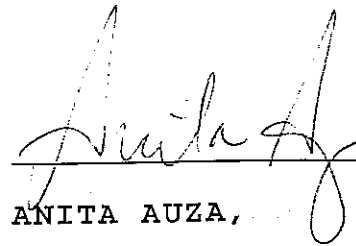
469 Q- You don't know. Okay.

A- What I can say, and I don't mind saying it, that  
he is and has been, for the last year, so

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I, ANITA AUZA, Official Court Reporter in the  
Judicial District of Montreal, hereby certify that  
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transcript of the proceeding taken to the best of my  
skill, ability, and understanding,

And I have signed



ANITA AUZA,

Official Court Reporter



COUR SUPÉRIEURE  
PROVINCE DE QUÉBEC  
DISTRICT DE MONTRÉAL

No : 500-17-038173-079

CANADIAN FEDERATION OF STUDENTS, QUÉBEC  
COMPONENT, Demanderesse

c.

NINA AMIROV ET AL,

Défendeurs

et

MALAMO BEAUMONT-SAVVAS ET AL,

Mis en cause

No : 500-17-038176-072

FÉDÉRATION CANADIENNE DES ÉTUDIANTES ET DES  
ÉTUDIANTS, ÉLÉMENT DU QUÉBEC ET AL,

Demandeurs

c.

GEORGES SOULE ET AL,

Défendeurs

PIÈCE D-13

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