CANADA PROVINCE OF QUÉBEC District of MONTREAL NO: 500-17-064306-114 NO: 500-17-064918-116	SUPERIOR COURT (CIVIL DIVISION)

JOINT DECLARATION THAT A FILE IS COMPLETE
in lieu of the declarations required by Articles 274.1 and 274.2 C.C.P. and Rules 15 and 77 a) R.C.P.

IDENTIFICATION OF THE PARTIES AND THEIR COUNSEL

PLAINTIFFS (500-17-064306-114)	LAWYER(S) IN CHARGE
CONCORDIA STUDENT UNION	**Me Martin Côté** **Me Philippe-André Tessier**
	ROBINSON SHEPPARD SHAPIRO, S.E.N.C.R.L.
1455 De Maisonneuve Boulevard. West., Suite H-711, Montreal, QC, H3G 2J1	800 Place Victoria, Suite 4600, Montreal, QC, H4Z 1H6
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PLAINTIFFS (500-17-064918-116)	LAWYER(S) IN CHARGE
GRADUATE STUDENT ASSOCIATION OF CONCORDIA UNIVERSITY	**Me Martin Côté** **Me Philippe-André Tessier**
	ROBINSON SHEPPARD SHAPIRO, S.E.N.C.R.L.
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105-2000, Avenue Northcliffe, Montreal, QC, H4A 3K5	mcote@rsslex.com patessier@rsslex.com

DEFENDANT (500-17-064306-114 and 500-17-064918-116)	LAWYER(S) IN CHARGE
CANADIAN FEDERATION OF STUDENTS	**Me François Viau** **Me Pierre-Luc Beauchesne**
	GOWLING LAFLEUR HENDERSON, S.E.N.C.R.L.
338C Somerset Street West, Ottawa, ON, K2P 0J9;	1 Place Ville-Marie, 37th Floor, Montreal, QC, H3B 3P4
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THE ISSUE(S) IN DISPUTE

NATURE OF THE DISPUTE (500-17-064306-114)	AMOUNT IN DISPUTE
PRINCIPAL ACTION : Action for declaratory judgment and to claim damages.	$ 100,000
COUNTERCLAIM : Action to claim membership fees.	$ 1,842,374.20

NATURE OF THE DISPUTE (500-17-064918-116)	AMOUNT IN DISPUTE
PRINCIPAL ACTION : Action for declaratory judgment and to claim damages.	$ 100,000
COUNTERCLAIM : Action to claim membership fees dues.	$ 780,635.85

POSITIONS OF THE PARTIES

PLAINTIFFS (500-17-064306-114)

a. The proposal submitting Amendments to Article 6 of BYLAW I of the Canadian Federation of Students presented during the November 2009 Annual Meeting of the Canadian Federation of Students (hereinafter the "**Amendment Proposal**") was not validly adopted in accordance with the Constitution and BYLAWS (BYLAW XV) of the Canadian Federation of Students (hereinafter the "**CFS**");

b. Notwithstanding the foregoing, without any admission whatsoever, should this Court conclude that the Amendment Proposal was validly adopted, the Amendment Proposal is not applicable to the Concordia Student Union's (hereinafter the "**CSU**") petition to hold a referendum on its continued membership in the CFS since said petition was received by CFS on October 19, 2009;

c. Following the results of the referendum held from March 23rd to 25th, 2010 on CSU's continued membership in the CFS, Plaintiffs are no longer members of the CFS;

d. The course of action and campaign of the CFS constitute an unlawful and intentional interference with the fundamental right of freedom of association of CSU's members and consequently Plaintiffs are entitled to claim damages from Defendant;

e. The Acknowledgement document (Exhibit P-14) is null and void for all legal purposes;

f. CSU does not owe any moneys in the form of uncollected and/or unremitted membership fees or otherwise to the CFS;

g. Subsidiarily, and without any admission whatsoever, should this Court come to the conclusion that the CSU has in fact accumulated CFS membership fees arrears over the past years, any arrears relating to the period prior to January 25, 2009 are now prescribed;

DEFENDANT (500-17-064306-114)

a. Defendant Canadian Federation of Students (hereinafter "CFS") is a non-profit organization constituted under Part II of the Canada Corporations Act. CFS was founded in order to unify student voices across Canada and to express their needs and interests both on a provincial and national scale. CFS has two types of members, individual and voting members. The voting members of CFS are local student associations which act as representatives of their individual members. As for the individual members, they are all student members belonging to a local student association, which is itself a voting member of CFS. To disaffiliate from CFS, a referendum on the question of continued membership must also be held by CFS in which the individual members belonging to the local student association vote on said question, subject to the rules and procedures provided for in the statutes of CFS.

b. On or about November 25, 2009, the National Executive of CFS received a petition submitted by individual members of the Plaintiff Concordia Student Union (hereinafter "CSU") who are students at Concordia University seeking a referendum on the question of continued membership in CFS. On many occasions, CSU was advised that the referendum on continued membership in CFS could only be held in conformity with CFS Bylaws and that any referendum held in contravention would not be recognized nor considered as binding by CFS. CSU nonetheless held a vote on the question of continued membership from March 23 to March 25, 2010, the whole in contravention with the Bylaws of CFS. The results of the said referendum could not be recognized by CFS nor be binding on CFS since the referendum was conducted in contravention with its Bylaws. Given that the vote held by CSU is invalid, CSU is, therefore, still a voting member of CFS.

c. The November 2009 amendment of the Bylaws does apply to CSU and does not have a retroactive effect. Furthermore, the November 2009 amendment of the Bylaws was duly adopted, since a vote of two thirds of the voting members present was favourable to the Motion to Amend the Bylaws.

d. On or about April 19, 2009, CSU recognized to be indebted to CFS in the amount of $1,033,278.76 on account of unremitted membership fees, the whole as more fully appears from the acknowledgement of debt (P-14). The acknowledgment of debt (P-14) is valid and binds CSU since it was signed by CSU's president. To date, CSU is owing to CFS the amount of $1,842,374.20 representing unpaid membership fees due.

PLAINTIFFS (500-17-064918-116)

a. The proposal submitting Amendments to Article 6 of BYLAW I of the Canadian Federation of Students presented during the November 2009 Annual Meeting of the Canadian Federation of Students (hereinafter the "**Amendment Proposal**") was not validly adopted in accordance with the Constitution and BYLAWS (BYLAW XV) of the Canadian Federation of Students (hereinafter the "**CFS**");

b. Notwithstanding the foregoing, without any admission whatsoever, should this Court conclude that the Amendment Proposal was validly adopted, the Amendment Proposal is not applicable to the Concordia University Graduate Students' Association's (hereinafter the "**GSA**") petition to hold a referendum on its continued membership in the CFS since said petition was received by CFS on November 10, 2009;

c. Following the results of the referendum held from April 6th to 8th, 2010 on GSA's continued membership in the CFS, Plaintiffs are no longer members of the CFS;

d. The course of action and campaign of the CFS constitute an unlawful and intentional interference with the fundamental right of freedom of association of GSA's members and consequently Plaintiffs are entitled to claim damages from Defendant;

e. GSA does not owe any moneys in the form of uncollected and/or unremitted membership fees or otherwise to the CFS;

f. Subsidiarily, and without any admission whatsoever, should this Court come to the conclusion that the GSA has in

fact accumulated CFS membership fees arrears over the past years, any arrears relating to the period prior to January 23, 2009 are now prescribed;

DEFENDANT (500-17-064918-116)

a. Defendant Canadian Federation of Students (hereinafter "CFS") is a non-profit organization constituted under Part II of the Canada Corporations Act. CFS was founded in order to unify student voices across Canada and to express their needs and interests both on a provincial and national scale. CFS has two types of members, individual and voting members. The voting members of CFS are local student associations which act as representatives of their individual members. As for the individual members, they are all student members belonging to a local student association, which is itself a voting member of CFS. To disaffiliate from CFS, a referendum on the question of continued membership must also be held by CFS in which the individual members belonging to the local student association vote on said question, subject to the rules and procedures provided for in the statutes of CFS.

b. On or about November 25, 2009, the National Executive of CFS received a petition submitted by individual members of the Plaintiff Graduate Student Association of Concordia University (hereinafter "GSA") who are students at Concordia University seeking a referendum on the question of continued membership in CFS. On many occasions, GSA was advised that the referendum on continued membership in CFS could only be held in conformity with CFS Bylaws and that any referendum held in contravention would not be recognized nor considered as binding by CFS. GSA nonetheless held a vote on the question of continued membership from April 6 to April 8, 2010, the whole in contravention with the Bylaws of CFS. The results of the said referendum could not be recognized by CFS nor be binding on CFS since the referendum was conducted in contravention with its Bylaws. Given that the vote held by GSA is invalid, GSA is, therefore, still a voting member of CFS.

c. The November 2009 amendment of the Bylaws does apply to GSA and does not have a retroactive effect. Furthermore, the November 2009 amendment of the Bylaws was duly adopted, since a vote of two thirds of the voting members present was favourable to the Motion to Amend the Bylaws.

d. GSA is owing to CFS the amount of $780,635.85, representing unpaid membership fees.

SPECIFIC QUESTIONS IN ISSUE

500-17-064306-114

a. Was the proposal submitting Amendments to Article 6 of BYLAW I of the Canadian Federation of Students presented during the November 2009 Annual Meeting of the Canadian Federation of Students (hereinafter the "**Amendment Proposal**") validly adopted in accordance with the Constitution and BYLAWS (BYLAW XV) of the Canadian Federation of Students (hereinafter the "**CFS**");

b. Notwithstanding the foregoing, without any admission whatsoever, should this Court conclude that the Amendment Proposal was validly adopted, is the Amendment Proposal applicable to the Concordia Student Union's (hereinafter the "**CSU**") petition to hold a referendum on its continued membership in the CFS;

c. Following the results of the referendum held from March 23rd to 25th, 2010 on CSU's continued membership in the CFS, are Plaintiffs still members of the CFS;

d. Does the course of action and campaign of the CFS constitute an unlawful and intentional interference with the fundamental right of freedom of association of CSU's members and, if so, are Plaintiffs entitled to claim damages from Defendant;

e. Is the Acknowledgement document (Exhibit P-14) valid;

f. Does the CSU owe any moneys in the form of uncollected and/or unremitted membership fees or otherwise to the CFS;

g. Subsidiarily, and without any admission whatsoever, should this Court come to the conclusion that the CSU has in fact accumulated CFS membership fees arrears over the past years, are such arrears relating to the period prior to January 25, 2009 prescribed;

500-17-064918-116

a. Was the proposal submitting Amendments to Article 6 of BYLAW I of the Canadian Federation of Students presented during the November 2009 Annual Meeting of the Canadian Federation of Students (hereinafter the "**Amendment Proposal**") validly adopted in accordance with the Constitution and BYLAWS (BYLAW XV) of the Canadian Federation of Students (hereinafter the "**CFS**");

b. Notwithstanding the foregoing, without any admission whatsoever, should this Court conclude that the Amendment Proposal was validly adopted, is the Amendment Proposal applicable to the Concordia University Graduate Students' Association's (hereinafter the "**GSA**") petition to hold a referendum on its continued membership in the CFS;

c. Following the results of the referendum held from April 6th to 8th, 2010 on GSA's continued membership in the CFS, are Plaintiffs still members of the CFS;

d. Does the course of action and campaign of the CFS constitute an unlawful and intentional interference with the fundamental right of freedom of association of GSA's members and, if so, are Plaintiffs entitled to claim damages from Defendant;

e. Does the GSA owe any moneys in the form of uncollected and/or unremitted membership fees or otherwise to the CFS;

f. Subsidiarily, and without any admission whatsoever, should this Court come to the conclusion that the GSA has in fact accumulated CFS membership fees arrears over the past years, are such arrears relating to the period prior to January 23, 2009 prescribed;

CONCLUSIONS SOUGHT

PRINCIPAL ACTION (500-17-064306-114)

DECLARE that the proposal submitting Amendments to BYLAW I of the Canadian Federation of Students presented during the November 2009 Annual Meeting of the Canadian Federation of Students was not validly adopted in accordance with the Constitution and BYLAWS (BYLAW XV) of the Canadian Federation of Students and that this proposal is consequently deemed to be invalid for all legal purposes;

DECLARE that the Acknowledgement document executed on April 19, 2009 by Keyana Kashfi on behalf of the Concordia Student Union is null and void for all legal purposes;

DECLARE that the results of the referendum held from March 23rd to 25th, 2010 on Concordia Student Union's continued membership in the Canadian Federation of Students, namely :

"Are you in favor of continued membership in the Canadian Federation of Students?": Yes : 931 No: 2,348

are valid and binding on the Canadian Federation of Students;

DECLARE that, following the results of the referendum held from March 23rd to 25th, 2010 on Concordia Student Union's continued membership in the Canadian Federation of Students, the Concordia Student Union is no longer a member of the Canadian Federation of Students as of May 21, 2010 and that CSU owes no moneys in the form of uncollected and/or unremitted membership fees or otherwise to the CFS, with the exception of the CSU membership fees for the 2009-2010 academic year to be determined by this court in the court file bearing number 500-17-055275-096;

CONDEMN Defendant, Canadian Federation of Students, to pay to Plaintiffs by way of punitive damages pursuant to Articles 3 and 49 of the Charter of Human Rights and Freedoms the sum of one hundred thousand dollars ($100,000.00), the whole with interest at the legal rate, together with the indemnity provided by Article 1619 of the Civil Code of Quebec, from the date of institution of the present proceedings;

RESERVE all of Plaintiffs rights against Mise en Cause Keyana Kashfi.

THE WHOLE with costs.

COUNTERCLAIM (500-17-064306-114)

CONDEMN Plaintiff Concordia Student Union, Inc. to pay to Defendant the amount of $1,842,374.20, with interest at the legal rate and the additional indemnity provided for by section 1619 of the Québec Civil Code, as of the date of service of the present plea and cross-demand;

THE WHOLE with costs.

PRINCIPAL ACTION (500-17-064918-116)

DECLARE that the proposal submitting Amendments to BYLAW I of the Canadian Federation of Students presented during the November 2009 Annual Meeting of the Canadian Federation of Students was not validly adopted in accordance with the Constitution and BYLAWS (BYLAW XV) of the Canadian Federation of Students and that this proposal is consequently deemed to be invalid for all legal purposes;

DECLARE that the results of the referendum held from April 6th to April 8th, 2010 on the Graduate Student Association of Concordia University's continued membership in the Canadian Federation of Students, namely :

"Are you in favor of continued membership in the Canadian Federation of Students?": Yes : 148 No: 456

are valid and binding on the Canadian Federation of Students;

DECLARE that, following the results of the referendum held from April 6th to April 8th, 2010 on the Graduate Student Association of Concordia University's continued membership in the Canadian Federation of Students, the Graduate Student Association of Concordia University is no longer a member of the Canadian Federation of Students as of May 23, 2010;

CONDEMN Defendant, Canadian Federation of Students, to pay to Plaintiffs by way of punitive damages pursuant to Articles 3 and 49 of the Charter of Human Rights and Freedoms the sum of one hundred thousand dollars ($100,000.00), the whole with interest at the legal rate, together with the indemnity provided by Article 1619 of the Civil Code of Quebec, from the date of institution of the present proceedings;

THE WHOLE with costs.

COUNTERCLAIM (500-17-064918-116)

CONDEMN Plaintiff Graduate Student Association of Concordia University to pay to Defendant the amount of $780,635.85, with interest at the legal rate and the additional indemnity provided for by section 1619 of the Québec Civil Code, as of the date of service of the present plea and cross-demand;

THE WHOLE with costs.

ADMISSIONS

None at the present time.

EXHIBITS

The parties agree that this joint declaration replaces all of the proceedings filed under Art. 403 C.C.P., if any:
YES X (check) NO ☐ (check)

PLAINTIFFS (500-17-064306-114)

EXHIBIT NUMBER[1]	DESCRIPTION	CONTENT ADMITTED	ADMISSION OF AUTHENTICITY WITHOUT ADMISSION OF CONTENT	ADMISSION OF RECEIPT WITHOUT ADMISSION OF CONTENT
P-1	CIDREQ of the Registraire des enterprises du Québec for CSU;		X	
P-2	Extract of Industry Canada's website for CFS;	X		
P-3	Extract of the minutes of the 33rd Semi-Annual National General Meeting of CFS, a letter dated September 30, 1998 from CSU to CFS and an extract of the minutes of the 17th Annual National General Meeting of CFS, *en liasse*;	X		
P-4	Letter dated October 19, 2009 from Alexandra Gill, member of CSU to CFS and an affidavit of service, *en liasse*;		X	
P-4A	CSU petition attached to letter dated October 19, 2009 from CSU to CFS;		X	
P-5	Constitution and By-Laws of CFS as amended at the November 2008 national general meeting;	X		
P-6	Internal Affairs, National Executive Report of CFS for the May 17, 2009 to November 24, 2009 period;	X		
P-7	Letter dated November 13, 2009 from CFS to CSU and an e-mail dated December 2, 2009 from CFS to CSU, en liasse;	X		
P-8	Letter dated January 11, 2010 from the University of Concordia Dean of Students;		X	
P-9	Letter dated January 10, 2010 from CFS to CSU;	X		
P-10	Letter dated January 26, 2010 from CSU to CFS;		X	
P-11	Letter dated February 3, 2010 from CSU to CFS;		X	
P-12	Letter dated February 5, 2010 from Gowlings to RSS;	X		
P-13	Letter dated February 10, 2010 from Gowlings to RSS;	X		
P-14	Acknowledgement of Debt Agreement signed by the Former President of CSU, Keyana Kashfi on April 19, 2009 for a total amount of $1,033,278.76;	X		
P-15	Letter dated February 11, 2010 from RSS to Gowlings;		X	
P-16	Letter dated February 11, 2010 from RSS to Keyana Kashfi, a letter dated February 18, 2010 from RSS to Keyana Kashfi and proof of service, *en liasse*;		X	

[1] The parties should avoid duplicating exhibits; If an exhibit has been filed by a party, the other party should refer to said exhibit without filing it again. If more than one party has filed an exhibit, please indicate all of the numbers under which said exhibit has been filed.

P-17	Letter dated February 19, 2010 from RSS to Gowlings;		X	
P-18	Letter dated February 23, 2010 from Gowlings to RSS;	X		
P-19	November 2009 Amendment proposal of Article 6 of BYLAW I of CFS;			
P-20	Press article entitled PGSS to debate CFS referendum published on January 21, 2010 in the McGill Daily;		X	
P-21	Requête introductive d'instance ré-amendée and the court docket for court file bearing number 500-17-055275-096, *en liasse*;		X	
P-22	Letter dated September 13,2 009 from CFS to CSU;	X		
P-23	Extract of CFS' Finance National Executive Report (May 17, 2009 to November 24, 2009);	X		
P-24	General By-Laws of the CSU and the CSU Code of Standing Regulations, *en liasse*;		X	
P-25	Judgment rendered by the Honourable Robert Castiglio dated April 2, 2009 in the case of Blais vs Union Étudiante de Concordia, 2009 QCCS 1548;	X		
P-26	CSU Presidential Decree executed February 25, 2010;		X	
P-27	Letter dated February 26, 2010 from RSS to Gowlings;		X	
P-28	Letter dated March 3, 2010 from CFS to Mr. Sohrab Mossaded, Chair of the Council of the CSU;	X		
P-29	Letter dated March 5, 2010 from CSU to CFS;		X	
P-30	Concordia Student Union & Canadian Federation of Students Referendum Protocol dated March 2010;			X
P-31	University of Victoria Graduate Students' Society & Canadian Federation of Students Referendum Protocol dated March 2008;	X		
P-32	Advertisement materials prepared by Students for Working With the More than 600,000 Members of the CFS, *en liasse*;			
P-33	CFS advertisement published in The Link;	X		
P-34	Letter dated May 21, 2010 from CSU to CFS;		X	
P-35	Letter dated July 27, 2010 from CFS to CSU;	X		
P-36	Letter dated March 2, 2011 of CFS to CSU;	X		
P-37	Judgment dated March 24, 2010 in the matter of University of Guelph Central Student Association c. Canadian Federation of Students and Canadian Federation of Students-Ontario, 2010 ONSC 1790;	X		
P-38	Requête introductive d'instance ré-amendée filed by the Rassemblement des Associations Étudiantes in court file bearing number 500-17-055275-096;		X	
P-39	Amended Motion to Institute Proceedings filed by PGSS in court file bearing number 500-17-055858-107;		X	
P-40	Amended Plea of the CFS filed against the Amended Motion to Institute Proceedings of PGSS in court file bearing number 500-17-055858-107;	X		
P-41	Answer to Amended Plea of the CFS filed by PGSS in court file bearing number 500-17-055858-107;		X	
P-42	Minutes of the 28th Annual National General Meeting of CFS held November 25 to 28, 2009;	X		

P-43	Audio recording of the vote held on the November 2009 proposal of amendment of the Bylaw I of CFS;			
P-44	Minutes of the Open Session of the Meetings of the Concordia University Board of Governors held October 21 and November 18, 1998;		X	
P-45	CFS Québec National Executive Report (October 10, 2005 to April 13, 2006);	X		
P-46	Extract of the CSU website archives;			
P-47	Minutes of the Open Session of the Meetings of the Concordia University Board of Governors held December 14, 2007;		X	
P-48	Letter dated November, 3, 2011 from Daniel Therrien, CA, University Controller at Concordia University and spreadsheet entitled Concordia University billing and collection of CSU fee levies - Canadian Federation of Student fee - historical information, *en liasse*;		X	
P-49	Minutes of the National Executive Meeting of CFS held November 24, 2009;	X		
P-50	Minutes of the National Executive Meeting of CFS held January 7 to 9, 2010;	X		
P-51	Minutes of the National Executive Meeting of CFS held April 21 to 23, 2010;	X		
P-52	Extract of the Minutes of the 55th Semi-Annual National General Meeting of the CFS held May 25, 2010;	X		

DEFENDANT (500-17-064306-114)

EXHIBIT NUMBER[1]	DESCRIPTION	CONTENT ADMITTED	ADMISSION OF AUTHENTICITY WITHOUT ADMISSION OF CONTENT	ADMISSION OF RECEIPT WITHOUT ADMISSION OF CONTENT
D-1	Constitution and Bylaws of CFS;			X
D-1A	Amended Constitution and Bylaws of CFS;			X
D-2	Excerpt of the Registrar of Federal Corporations regarding CFS;		X	
D-3	Excerpts of the databank of the Office of Intellectual Property, *en liasse*;		X	
D-4	Excerpt of the Enterprise Register regarding RAE;	X		
D-5	*Introductory Motion* in the Court file 500-17-055275-096;		X	
D-6	*Amended Motion to obtain a safeguard order, interlocutory and permanent injunctions and for damages* the Court file 500-17-055787-108;		X	
D-7	Judgment on the safeguard order;	X		
D-8	Demand for a supplementary letters patent;	X		
D-9A	Membership dues owing;			X
D-10	Closing Plenary Minutes of the 28th Annual General Meeting of the CFS;		X	
D-11	Documents in support of Exhibit D-9;			X

PLAINTIFFS (500-17-064918-116)				
EXHIBIT NUMBER[2]	DESCRIPTION	CONTENT ADMITTED	ADMISSION OF AUTHENTICITY WITHOUT ADMISSION OF CONTENT	ADMISSION OF RECEIPT WITHOUT ADMISSION OF CONTENT
PGS-1	CIDREQ of the *Registraire des entreprises du Québec* for GSA;		X	
~~PGS-2 (P-2)~~	~~Extract of Industry Canada's website for CFS;~~	~~X~~		
PGS-3	Extracts of the minutes of the 25th Semi-Annual National General Meeting of the CFS and of the 13th Annual General Meeting of the CFS, *en liasse*;	X		
PGS-4	Letter dated March 9th, 1995 from GSA to Concordia University;		X	
PGS-5	Letter dated November 5, 2009 from GSA to CFS and its minutes of service, *en liasse*;		X	
PGS-5A	GSA petition attached to letter dated November 5, 2009 from GSA to CFS;		X	
~~PGS-6 (P-5)~~	~~Constitution and By-Laws of CFS as amended at the November 2008 national general meeting;~~	~~X~~		
PGS-7	Letter dated December 17th, 2009 from the University of Concordia Dean of Students;		X	
PGS-8	Letter dated February 4th, 2010 from GSA to CFS;		X	
PGS-9	Letter dated February 8th, 2010 from RSS to Gowlings and a letter dated February 11th, 2010 from RSS to Gowlings, *en liasse*;		X	
PGS-10	Letter dated February 10, 2010 from Gowlings, but only faxed to RSS on February 15th, 2010;	X		
PGS-11	Letter dated February 8th, 2010 from CFS to GSA;	X		
PGS-12	Letter dated February 26th, 2010 from RSS to Gowlings;		X	
PGS-13	Letter dated March 12th, 2010 from RSS to Gowlings;		X	
PGS-14	Letter dated March 16th, 2010, from RSS to Gowlings;		X	
PGS-15	Letter dated March 17th, 2010, from Gowlings to RSS;	X		
~~PGS-16 (P-19)~~	~~November 2009 Amendment proposal of Article 6 of BYLAW I of CFS;~~			
~~PGS-17 (P-20)~~	~~Press article entitled PGSS to debate CFS referendum published on January 21, 2010 in the McGill Daily;~~		~~X~~	
~~PGS-18 (P-23)~~	~~Extract of CFS' Finance National Executive Report (May 17, 2009 to November 24, 2009);~~	~~X~~		
PGS-19	March 24th, 2010 notice of Roddy Doucet, Chief Returning Officer of GSA;		X	
PGS-20	Official notice of results dated April 9, 2010 from Roddy Doucet, Chief Returning Officer of GSA;		X	
PGS-21	Two emails dated May 17, 2010 from Erik Chevrier, representative of the GSA, to the National Executive of the CFS, *en liasse*;		X	
PGS-22	Email dated May 19, 2010 from Katherine Giroux-Bougard to Erik Chevrier;	X		
PGS-23	Email dated May 21, 2010 from Katherine Giroux-Bougard to Erik Chevrier;	X		

[2] The parties should avoid duplicating exhibits; if an exhibit has been filed by a party, the other party should refer to said exhibit without filing it again. If more than one party has filed an exhibit, please indicate all of the numbers under which said exhibit has been filed.

PGS-24	Letter dated May 21, 2010 from GSA to CFS;		X	
PGS-25	Letter dated March 2, 2011 of CFS to GSA;	X		
~~PGS-26 (P-37)~~	~~Judgment dated March 24, 2010 in the matter of University of Guelph Central Student Association c. Canadian Federation of Students and Canadian Federation of Students Ontario, 2010 ONSC 1790;~~	~~X~~		
PGS-27	Judgment dated February 1, 2011 in the matter of University of Victoria Students' Society v. Canadian Federation of Students, 2011 BCSC 122;	X		
PGS-28	Judgment dated February 18, 2011 in the matter of University of Victoria Students' Society v. Canadian Federation of Students, 2011 BCSC 401;	X		
~~PGS-29 (P-38)~~	~~Requête introductive d'instance ré-amendée filed by the Rassemblement des Associations Étudiantes in court file bearing number 500-17-055275-096;~~		~~X~~	
~~PGS-30 (P-39)~~	~~Amended Motion to Institute Proceedings filed by PGSS in court file bearing number 500-17-055858-107;~~		~~X~~	
~~PGS-31 (P-40)~~	~~Amended Plea of the CFS filed against the Amended Motion to Institute Proceedings of PGSS in court file bearing number 500-17-055858-107;~~	~~X~~		
~~PGS-32 (P-41)~~	~~Answer to Amended Plea of the CFS filed by PGSS in court file bearing number 500-17-055858-107;~~		~~X~~	
~~PGS-33 (P-42)~~	~~Minutes of the 28th Annual National General Meeting of CFS held November 25 to 28, 2009;~~	~~X~~		
~~PGS-34 (P-43)~~	~~Audio recording of the vote held on the November 2009 proposal of amendment of the Bylaw I of CFS;~~			
PGS-35	Concordia University Minutes of the Open Session of the Meeting of the Board of Governors held April 19, 1995;		X	
PGS-36	Concordia University Minutes of the Open Session of the Meeting of the Board of Governors held May 15, 2002;		X	
PGS-37	Letter dated June 26, 2012 from Daniel Therrien, CA, University Controller at Concordia University and spreadsheets entitled *Concordia University billing and collection of GSA fee levies - Canadian Federation of Student fee - historical information and Concordia University billing and collection of GSA fee levies - Canadian Federation of Student – Quebec fee - historical information, en liasse*;		X	
PGS-38	Three cheques made to the order of CFS or CFS-Québec, *en liasse*;		X	
~~PGS-39 (P-50)~~	~~Minutes of the National Executive Meeting of CFS held January 7 to 9, 2010;~~	~~X~~		
~~PGS-40 (P-51)~~	~~Minutes of the National Executive Meeting of CFS held April 21 to 23, 2010;~~	~~X~~		

DEFENDANT (500-17-064918-116)

EXHIBIT NUMBER[1]	DESCRIPTION	CONTENT ADMITTED	ADMISSION OF AUTHENTICITY WITHOUT ADMISSION OF CONTENT	ADMISSION OF RECEIPT WITHOUT ADMISSION OF CONTENT
~~DGS-1 (D-1)~~	~~Constitution and Bylaws of CFS;~~			X
~~DGS-1A (D-1A)~~	~~Amended Constitution and Bylaws of CFS;~~			X
~~DGS-2 (D-2)~~	~~Excerpt of the Registrar of Federal Corporations regarding CFS;~~		~~X~~	
~~DGS-3 (D-3)~~	~~Excerpts of the databank of the Office of Intellectual Property, *en liasse*;~~		~~X~~	

~~DGS-4 (D-4)~~	~~Excerpt of the Enterprise Register regarding RAE;~~	~~X~~		
~~DGS-6 (D-5)~~	~~*Introductory Motion* in the Court file 500-17-055275-096;~~		~~X~~	
~~DGS-6 (D-8)~~	~~*Amended Motion to obtain a safeguard order, interlocutory and permanent injunctions and for damages* the Court file 500-17-055787-108;~~		~~X~~	
~~DGS-7 (D-7)~~	~~Judgment on the safeguard order;~~	~~X~~		
~~DGS-8 (D-8)~~	~~Demand for a supplementary letters patent;~~	~~X~~		
DGS-9	Headcount of graduate students from 1994 to 2009;		X	
DGS-10A	Statement of membership fees due;			X
~~DGS-11 (D-10)~~	~~Closing Plenary Minutes of the 28th Annual General Meeting of the CFS;~~		~~X~~	
DGS-12	Documents in support of Exhibit D-10			X

OUT OF COURT EXAMINATIONS FILED

EXAMINATIONS FOR DISCOVERY (Arts. 93.1, 397, 398, 398.1 and 398.2 C.C.P.)				
NAME OF WITNESS	EXAMINED BY	DATE OF EXAMINATION	FILED (In full or in part)	NUMBER OF PAGES FILED
Lucy Watson	Me Martin Côté	February 1st, 2012	In full	163 + 41
Mohamed Amine Dabchy	Me François Viau	August 25th, 2011	In full	143
Hassan Abdullahi	Me François Viau	August 25th, 2011	In full	24
Erik Chevrier	Me François Viau	July 6th, 2011	In full	57
Robert Sonin	Me François Viau	July 6th, 2011	In full	74

LIST OF WITNESSES

Note : Time estimates must be as serious and precise as possible in order to realistically assess the approximate time available for each party and the total duration of the trial, although the duration of examinations and cross-examinations within the period of time available for each party may vary at trial.
Note : In the event that during its preparation for or at trial, a party wishes to replace or remove a witness, said party undertakes to notify the other parties without delay.

PLAINTIFFS

WITNESSES	LANGUAGE (F/E)	INTERPRETER	SUBJECT OF TESTIMONY	TIME NEEDED FOR EXAMINATION IN CHIEF	TIME NEEDED FOR CROSS-EXAMINATIONS (FOR EACH OF THE OTHER PARTIES)								TOTAL DURATION FOR WITNESS
ORDINARY WITNESSES													
Amine Dabchy	F		His implication as President of the CSU regarding all of the facts in dispute.	4 hours	1hour 30 min.								5 hours 30 min.
Auob Muntasar	E		His implication as V.-P. External of the CSU and as member of the Referendum Oversight Committee.	30 minutes	30 min.								1 hour
Hassan Abdullahi	E		His signing of the petition calling for a referendum on CSU's continued membership in the CFS and his voting in the referendum held on CSU's continued membership in the CFS.	15 minutes	15 min.								30 min.
Alexandra Gill	E		The filing of the petition calling for a referendum on CSU's continued membership in the CFS, her participation to the CFS' November 2009 National General meeting and her implication and knowledge with respect to the other facts in dispute.	2,5 hours	45 min.								3 hours 15 min.
Erik Chevrier	E		His implication as V.-P. External of the GSA, the filing of the petition calling for a referendum on GSA's continued membership in the CFS, his participation to the CFS' November 2009 National	4 hours	2 hours								6 hours

			General meeting and his implication and knowledge with respect to the other facts in dispute.										
Mahboubeh Khani	E		Her implication as President of the GSA regarding all of the facts in dispute.	30 minutes	15 min.								45 min.
Robert Sonin, Past GSA Executive	E		His knowledge of the facts surrounding the membership of the GSA within the CFS and his implication and knowledge with respect to the other facts in dispute.	30 minutes	15 min.								45 min.
Rodrigue Doucet	E		His implication as Chief Returning Officer for the Referendum (GSA).	15 minutes	15 min.								30 min.
Adrian Kaats	E		His participation to the CFS November 2009 National General meeting and the positions taken by the CFS with respect to the Post-Graduate Students' Society of McGill's ("PGSS") request for a referendum on PGSS's continued membership in the CFS and with respect to the referendum held on PGSS's continued membership in the CFS.	1 hour	1 hour								2 hours
Ladan Mahabadi	E		Her participation to the CFS November 2009 National General meeting.	30 minutes	15 min.								45 min.
Patrice Blais, Past CSU Executive	E		His knowledge of the facts surrounding the memberships of the CSU and GSA within the CFS.	45 minutes	45 min.								1 hour 30 min.
Rob Green, Past CSU Executive	E		His knowledge of the facts surrounding the membership of the CSU within the CFS.	30 minutes	15 min.								45 min.

Mohamed Shuriye, Past CSU Executive	E		His knowledge of the facts surrounding the membership of the CSU within the CFS.	30 minutes	15 min.								45 min.
Rocci Luppicini, Past GSA Executive	E		His knowledge of the facts surrounding the membership of the GSA within the CFS.	30 minutes	45 min.								1 hour 15 min.
Daniel Therrien, CA University Controller, Concordia University	E		Exhibits P-48 and PGS-37.	2 hours	1 hour 30 min.								3 hours 30 min.
Noah Stewart	E		His past implication with the CSU, knowledge of the facts surrounding the signing of the Acknowledgment document (Exhibit P-14) and knowledge of the other facts in dispute.	45 minutes	1 hour 30 min.								2 hours 15 min.
Collin Goldfinch	E		His past implication with the CSU, knowledge of the facts surrounding the signing of the Acknowledgment document (Exhibit P-14) and knowledge of the other facts in dispute.	30 minutes	30 min.								1 hour
Katherine Giroux-Bougard	E		Her participation to the CFS' November 2009 National General meeting, the positions taken by the CFS with respect to requests for a referendum on continued membership in the CFS and with respect to the referendums held on continued membership in the CFS and her knowledge of the other facts in dispute.	2 hours 30 min.	2 hours								4 hours 30 min.
Dave Molenhuis	E		His participation to the CFS' November 2009 National General meeting, the positions taken by the CFS with respect to requests for a referendum on continued membership in the CFS and with respect to the referendums held on	45 minutes	45 min.								1 hour 30 min.

			continued membership in the CFS and his knowledge of the other facts in dispute.										
A past CFS National Executive member.	E		Internal operation of the CFS.	2 hours	1 hour								3 hours
DEFENDANT													
WITNESSES	LANGUAGE (F/E)	INTERPRETER	SUBJECT OF TESTIMONY	TIME NEEDED FOR EXAMINATION IN CHIEF	TIME NEEDED FOR CROSS-EXAMINATIONS (FOR EACH OF THE OTHER PARTIES)								TOTAL DURATION FOR WITNESS
ORDINARY WITNESSES													
Lucy Watson	E		On all the facts in litigation.	6 hours	2 hours								8 hours
Dave Hare	E		On the amounts due by CSU and GSA.	2 hours	1 hour								3 hours
Brent Farrington	E		On the membership fees due by CSU and GSA.	2 hours	1 hour								3 hours
Keyana Kashfi	E		On the Acknowledgement of debt (P-14)	1 hour	30 min.								1 hour 30 min.
Toby Whitfield	E		On the membership fees due by GSA.	1 hour	30 min.								1 hour 30 min.
Natalie Pomerleau	E		On the membership fees due by CSU.	30 min.	30 min.								1 hour
Kate Boushel	E		On the membership fees due by CSU.	30 min.	30 min.								1 hour

TOTAL DURATION OF EVIDENCE: 60 hours.

PLEADINGS

	DURATION
PLAINTIFFS	6 hours
DEFENDANT	6 hours

DURATION OF PLEADINGS: 12 hours

TOTAL DURATION OF THE TRIAL: 15 days
(calculated on the basis of 5 HRS a day and taking into account the factors typically affecting the trial process)

ATTESTATIONS

THE LAWYERS, UNDER THEIR OATH OF OFFICE, DECLARE:

1. that they have explained to the party they represent: (a) his/her obligation to communicate all exhibits in his/her possession which he/she intends to invoke at the hearing and that said exhibits have been communicated to the other parties or will be so communicated by the deadline provided by Article 331.8 C.C.P.; and (b) the consequences of his/her failure to do so;
2. that the out of court examinations that have been filed constitute all of the examinations that the party intends to file in evidence;
3. that the list of identified witnesses is complete;
4. that they have informed their clients of the anticipated costs of the trial;
5. that the parties have explored the possibility of settling the matter out of court, by way of a settlement conference or otherwise; and
6. that the file is complete and that the parties are ready to proceed (77 a) R.C.P..).

Me Martin Côté — DATE: 21 février 2013

Me Pierre-Luc Beauchesne — DATE: 21 février 2013

No : **500-17-064306-114**

SUPERIOR COURT
DISTRICT OF MONTREAL

CONCORDIA STUDENT UNION, INC.

Plaintiff/Cross-Defendant

-and-

HASSAN ABDULLAHI

Plaintiff

vs.

CANADIAN FEDERATION OF STUDENTS

Defendant/Cross-Plaintiff

-and-

KEYANA KASHFI

Mise-en-cause

JOINT DECLARATION THAT A FILE IS COMPLETE
(ART. 274.1 AND 274.2 C.C.P. RULES 15 AND 77A) R.P.C. (S.C.))

ORIGINAL

Me Martin Côté

Our file: 29765-4

BR0163

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