

2001

S.K. No. 10,711

IN THE SUPREME COURT OF NOVA SCOTIA

**RECEIVED & FILED**

BETWEEN:

**SEP 19 2003**

**THE CANADIAN FEDERATION OF STUDENTS and  
CANADIAN FEDERATION OF STUDENTS - SERVICES**

**Court Administration Office  
Kentville Justice Centre**

**PLAINTIFFS**

- and -

**ACADIA STUDENTS' UNION**

**DEFENDANT**

**LIST OF DOCUMENTS**

The following is a list of documents relating to any matter in question in this proceeding that are or have been in the possession, custody or control of the Plaintiff and it is served in compliance with Rule 20.01.

1. The Plaintiffs have in their possession, custody or control the documents in this proceeding enumerated in Part 1 of the Schedule attached hereto;
2. The Plaintiffs object to produce the documents enumerated in Part 2 of the Schedule on the ground that they are privileged from production for the reasons stated in the Schedule;
3. The Plaintiffs have had, but have not now, in their possession, custody or control the documents enumerated in Part 3 of the Schedule which were last in their possession, custody or control as stated in the Schedule;
4. Neither the Plaintiff, nor their solicitor nor any other person on their behalf, has now or ever had, in his or her possession, custody or control any document of any description whatever relating to any matter in question in this proceeding other than the documents enumerated in the Schedule.

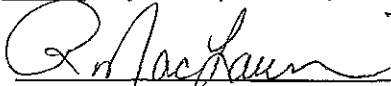
AND TAKE NOTICE that a true copy of each of the documents listed in Part 1 of the Schedule, for which privilege from production is not claimed, is attached hereto and any of these documents may be inspected by immediately communicating with the undersigned;

AND FURTHER TAKE NOTICE that unless you deny it by serving a notice thereof on me within ten (10) days after being served with this list of documents, or it is denied in your pleading, or the court otherwise orders, you shall be deemed to admit that any document listed in Part 1 of the Schedule, a true copy of which has been served on you, and described,

- (a) as an original document, is such a document and was printed, written, signed or executed as it purports respectively to have been; and
- (b) as a copy, is a true copy.

AND FURTHER TAKE NOTICE that, unless you are otherwise advised in writing, the Plaintiff will produce at the trial or hearing of the proceeding the documents listed in Part 1 of the Schedule, for which privilege from production is not claimed, without further notice from you.

DATED at Berwick, Nova Scotia, this 17 day of September, A.D., 2003.

  
E. ROXANNE MacLAURIN  
WATERBURY NEWTON  
Barristers and Solicitors  
188 Commercial Street  
P.O. Box 475  
Berwick, Nova Scotia  
B0P 1E0  
Solicitor for the PLAINTIFFS

TO: The Prothonotary

AND TO: The Defendant  
c/o Michael V. Coyle  
Muttart Tufts Dewolfe & Coyle  
P.O. Box 515  
Kentville, NS B4N 3X3

## SCHEDULE

### Part 1

#### TAB

1. Minutes of the 9th Annual General Meeting of the Canadian Federation of Students and 8th Semi Annual General Meeting of the Canadian Federation of Students - Services
2. Constitution and By-Laws Canadian Federation of Students as amended at the May 1993 National General Meeting
3. Constitution and By-Laws Canadian Federation of Students as amended at the November 1994 National General Meeting
4. Constitution and By-Laws Canadian Federation of Students as amended at the May 1995 National General Meeting
5. Constitution and By-Laws Canadian Federation of Students as amended at the November 1995 National General Meeting
6. Elections Act By-Laws - Acadia Students Union 1995 - 1996  
Acadia University Student Unions Directory from 1990 to 1991 indicating elected officials
8. Draft Minutes May 1995 National General Meeting Canadian Federation of Students - Services and Canadian Federation of Students - May 25 to 30, 1995 - St. Boniface, Manitoba
9. Correspondence dated August 3, 1994 from Thomas J. Storrington VP (Academic) Acadia Students Union to Guy Caron National Chairperson Canadian Federation of Students, etc.
10. Correspondence dated July 11, 1995 from Julia Carroll, President Acadia Students Union to Guy Caron, Chairperson Canadian Federation of Students
11. Correspondence dated August 3, 1995 from Guy Caron Canadian Federation of Students to Julia Carroll, President Acadia Students Union
12. Correspondence dated January 31, 1996 from Todd J. Burke of Gowlings to Julia Carroll, President Acadia Students Union
13. Correspondence dated February 1, 1996 from Michael V. Coyle, Muttart Tufts Dewolf & Coyle to Todd J. Burke of Gowlings
14. Correspondence dated February 16, 1996 from Michael V. Coyle, Muttart Tufts Dewolf & Coyle to Todd J. Burke
15. Correspondence dated October 5, 1998 from Todd J. Burke of Gowlings to Chris Houston, Acadia Students Union

16. Draft correspondence dated July 16, 1999 from Michael Conlon, National Chairperson to Stu Langille, Acadia Students Union
17. Correspondence dated May 2, 2000 from Todd J. Burke of Gowlings to Ruth Petrykanyyn, Acadia Students Union

## **SCHEDULE**

### **Part 2**

1. Various correspondence, notes, memoranda, and other communications obtained by or for or prepared by or for counsel for the Plaintiffs, either subsequent to retention of counsel or obtained in contemplation of litigation for all of which solicitor-client privilege is claimed.

### **Part 3**

NIL