

**FEDERAL COURT OF APPEAL**

**BETWEEN:**

**HER MAJESTY THE QUEEN IN RIGHT OF CANADA**

**Appellant**

**and**

**Neil ALLARD, Tanya BEEMISH, David HEBERT and Shawn DAVEY**

**Respondents**

**AGREEMENT AS TO CONTENTS OF APPEAL BOOK**

Counsel for the Appellant and counsel for the Respondents agree that the Appeal Book in this appeal shall contain:


- 1) notice of appeal (March 31, 2014);
- 2) notice of cross-appeal (April 16, 2014);
- 3) reasons for order and order of Mr. Justice Manson with respect to a motion for an interlocutory injunction sought within action no. T-2030-13 (March 21, 2014);
- 4) notice of motion seeking an interlocutory injunction within action no. T-2030-13 (January 31, 2014);
- 5) amended statement of claim for action no. T-2030-13 (January 21, 2014);
- 6) statement of defence for action no. T-2030-13 (February 14, 2014);
- 7) reply for action no. T-2030-13 (filed February 28, 2014, dated February 27, 2014);
- 8) notice of constitutional question for action no. T-2030-13 (January 22, 2014);
- 9) affidavit of Neil Allard (sworn January 10, 2014);
- 10) affidavit of David Hebert (sworn January 13, 2014);
- 11) affidavit of Tanya Beemish (sworn January 13, 2014);

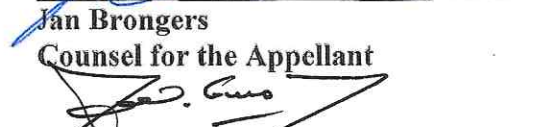
- 12) affidavit of Shawn Davey (sworn January 8, 2014);
- 13) affidavit of Brian Alexander (sworn January 8, 2014);
- 14) affidavit of Dan Nelson (sworn January 9, 2014);
- 15) affidavit of Zachary Walsh (sworn January 15, 2014);
- 16) affidavit of Susan Boyd (sworn January 15, 2014);
- 17) affidavit of David Pate (sworn January 16, 2014);
- 18) affidavit of Danielle Lukiv (sworn January 17, 2014);
- 19) affidavit of Shane Holmquist (affirmed February 4, 2014);
- 20) affidavit of Paul Grootendorst (sworn February 5, 2014);
- 21) affidavit of Jeannine Ritchot (affirmed February 7, 2014);
- 22) affidavit of Todd Cain (affirmed February 7, 2014);
- 23) written examination (dated February 19, 2014) and affidavit #2 of Paul Grootendorst (sworn February 21, 2014);
- 24) transcript of cross-examination of Shane Holmquist (February 28, 2014);
- 25) transcript of cross-examination of Jeannine Ritchot (February 20, 2014);
- 26) transcript of cross-examination of Todd Cain (February 20, 2014);
- 27) the agreement reached between the parties as to the contents of the appeal book; and
- 28) Form 344 certificate of completeness of appeal book.

I AGREE with the contents of the Appeal Book in this matter as set forth above.

Dated: April 17, 2014

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**Jan Brongers**  
**Counsel for the Appellant**

  
**John W. Conroy, Q.C.**  
**Counsel for the Respondents**