

<p style="text-align: center;">Court File No. CV-18-00602494-0000</p> <p style="text-align: center;"><b>ONTARIO SUPERIOR COURT OF JUSTICE</b></p> <p>B E T W E E N :</p> <p style="text-align: center;"><b>ROCCO ACHAMPONG</b></p> <p style="text-align: right;">Applicant</p> <p style="text-align: center;">- and -</p> <p style="text-align: center;"><b>ONTARIO (HON. DOUG FORD, PREMIER OF ONTARIO), ONTARIO (ATTORNEY-GENERAL), and CITY OF TORONTO</b></p> <p style="text-align: right;">Respondents</p>	<p style="text-align: center;">Court File No. CV-18-00603797-0000</p> <p style="text-align: center;"><b>ONTARIO SUPERIOR COURT OF JUSTICE</b></p> <p>B E T W E E N :</p> <p style="text-align: center;"><b>CITY OF TORONTO</b></p> <p style="text-align: right;">Applicant</p> <p style="text-align: center;">- and -</p> <p style="text-align: center;"><b>ATTORNEY GENERAL OF ONTARIO</b></p> <p style="text-align: right;">Respondent</p>
<p style="text-align: center;">Court File No. CV-18-00603633-0000</p> <p style="text-align: center;"><b>ONTARIO SUPERIOR COURT OF JUSTICE</b></p> <p>B E T W E E N :</p> <p style="text-align: center;"><b>CHRIS MOISE, ISH ADERONMU and PRABHA KHOSLA on her own behalf and on behalf of all members of WOMEN WIN TO</b></p> <p style="text-align: right;">Applicants</p> <p style="text-align: center;">- and -</p> <p style="text-align: center;"><b>ATTORNEY GENERAL OF ONTARIO and THE CORPORATION OF THE CITY OF TORONTO</b></p> <p style="text-align: right;">Respondents</p>	

**NOTICE OF MOTION**

**THE MOVING PARTIES**, Jennifer Hollett, Lily Cheng, Susan Dexter, Geoffrey Kettel, and Dyanoosh Youssefi, will make a motion to the Court on August 31, 2018 at 10:00 a.m., or as soon after that time as the motion can be heard, at Osgoode Hall, Courtroom 4, 130 Queen St West, Toronto, Ontario, M5H 2N5.

**THE PROPOSED METHOD OF HEARING:** The motion is to be heard orally.

**THE MOTION IS FOR:**

1. An Order granting Jennifer Hollett, Lily Cheng, Susan Dexter, Geoffrey Kettel, and Dyanoosh Youssefi (collectively, the “Proposed Intervenors”) leave to intervene in these Applications, as added parties, on the following terms:

- a. leave to file all affidavit material by August 22, 2018;
- b. leave to file a factum of not more than 30 pages by August 28, 2018;
- c. leave to make oral submissions on the hearing of the application; and
- d. that no costs shall be award in favour of, or against, the Proposed Intervenors; and

2. Such further relief as counsel may advise and this Court may deem just.

**THE GROUNDS FOR THE MOTION ARE AS FOLLOWS:**

1. Each of the Proposed Intervenors is a resident of the City of Toronto with a particular interest in the matters at issue in these Applications.

2. Ms. Hollett is an elector in the City of Toronto and a Candidate for City Council in the upcoming municipal election in Ward 21 (in the 47-ward system which became effective January 1, 2018). She is also a resident in this same ward.

3. Ms. Cheng is an elector in the City of Toronto and a Candidate for City Council in the upcoming municipal election in Ward 29 (in the 47-ward system which became effective January 1, 2018).

4. Ms. Dexter is an elector in the City of Toronto who is President of the Harbord Village Residents' Association and who participated in the Ward Boundary Review. She is a resident in Ward 20 (in the 47-ward system which became effective January 1, 2018).

5. Mr. Kettel is an elector in the City of Toronto who has been active in his community and who participated in the Ward Boundary Review which gave rise to the 47 ward system. He is a resident in Ward 33 (in the 47-ward system which became effective January 1, 2018).

6. Ms. Youssefi is an elector in the City of Toronto and a Candidate for City Council in the upcoming municipal election in Ward 14 (in the 47-ward system which became effective January 1, 2018).

7. The Applicant, Rocco Achampong, has brought an Application to challenge the revisions to the City of Toronto Wards as set out in Bill 5, the *Better Local Government Act, 2018*.

8. The Applicants, Chris Moise, Ish Aderonmu, and Prabha Khosla, on her own behalf and on behalf of all members of Women Win TO, have brought an Application to challenge the revisions to the City of Toronto Wards as set out in Bill 5, the *Better Local Government Act, 2018*.

9. The City Council of the City of Toronto has brought an Application to challenge the revisions to the City of Toronto Wards as set out in Bill 5, the *Better Local Government Act, 2018*.

10. All of the Proposed Intervenors have an interest in the above-noted Applications and may be adversely affected by a judgment in the proceedings.

11. The Applications raise public law issues of general importance respecting the conduct of democratic elections and the interference of the Crown in Right of Ontario in those elections.

12. The Proposed Intervenors can, through their affidavit evidence, ensure that the important matters at issue in these Applications are determined on the basis of a comprehensive factual record.

13. The Proposed Intervenors can also render assistance to the Court by way of argument, enhancing the Court's ability to determine the important public law questions that arise in these Applications.

14. The intervention will not unduly delay or prejudice the determination of the rights of the parties, as the Proposed Intervenors have agreed to be bound by the same timetable as set out in the Order of Glustein J. of August 14, 2018.

15. There is no injustice or prejudice in allowing the intervention.
16. Given that the subject matter of the Applications is of significant public importance, the Proposed Intervenors will not seek costs and ask that costs not be awarded against them.
17. Rule 13 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.
18. Such further grounds as counsel may advise and this Court may permit.

**THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:**

1. The affidavit of Jennifer Hollett, sworn August 21, 2018;
2. The affidavit of Lily Cheng, sworn August 21, 2018;
3. The affidavit of Susan Dexter, sworn August 21, 2018;
4. The affidavit of Geoff Kettel, sworn August 21, 2018;
5. The affidavit of Dyanoosh Youssefi, sworn August 22, 2018; and
6. Such further evidence as counsel may advise and this Court may accept.

August 28, 2018

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**ROCCO ACHAMPONG**

Applicant

**CHRIS MOISE, ISH ADERONMU, and PRABHA KHOSLA, on her own behalf and on behalf of all members of Women Win TO**

Applicant

**CITY OF TORONTO**

Applicant

-and-

**ONTARIO (HON. DOUG FORD, PREMIER OF ONTARIO),  
ONTARIO (ATTORNEY-GENERAL), and CITY OF TORONTO**

Respondent

-and-

**ATTORNEY GENERAL OF ONTARIO**

Respondent

-and-

**ATTORNEY GENERAL OF ONTARIO**

Respondent

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**ONTARIO  
SUPERIOR COURT OF JUSTICE**  
  
PROCEEDING COMMENCED AT  
TORONTO

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**NOTICE OF MOTION OF  
JENNIFER HOLLETT, LILY CHENG, SUSAN DEXTER,  
GEOFFREY KETTEL and DYANOOSH YOUSSEFI**

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