Ministry of the Attorney General

Civil Law Division

720 Bay Street, 4th Floor Toronto ON M7A 2S9

Tel: (416) 326-4473 Fax: (416) 326-4015

Audra.Ranalli@ontario.ca

Ministère du Procureur général

Division du droit civil

4e étage, 720, rue Bay Toronto ON M7A 2S9

Tél: (416) 326-4473 Téléc: (416) 326-4015

Audra.Ranalli@ontario.ca



September 12, 2018

Hand-Delivered

Office of the Registrar Ontario Court of Appeal 130 Queen Street West Toronto, Ontario M5H 2N5

Dear Registrar:

Re: Abridgment of time to serve/file motion materials for the motion to stay pending appeal of the decision of Belobaba J. in Rocco Achampong v. Ontario - Court File No.: CV-18-00602494-000; Chris Moise, Ish Aderonmu, and Prabha Khosla, on her own behalf and on behalf of all members of Women Win TO v. Attorney General of Ontario - Court File No.: CV-18-00603633-0000; and City of Toronto v. Attorney General of Ontario - Court File No.: 18-00604797-0000

I am counsel for the Attorney General of Ontario ("Ontario"). Ontario seeks an abridgment of the time to serve and file its motion materials for its motion to stay the decision of Belobaba J. in the above-noted proceedings pending an appeal of the decision by Ontario to this Court.

Ontario submits that the time to serve and file its motion materials should be abridged because of the particular urgency of this matter, as it is of critical importance to the upcoming October 22, 2018 Toronto City Council election. The issue on this motion is whether the decision of Justice Belobaba declaring invalid the portions of the *Better Local Government Act, 2018* that effected a change to a 25-ward system for Toronto City Council, and ordering that the October 22, 2018 election proceed on a 47-ward basis, should be stayed.

On August 20, 2018, the City Clerk advised City Council that she was prepared to run a 25-ward election on October 22 2018 as per the requirements of the *Better Local Government Act, 2018*. She advised at that time that reverting to a 47-ward election would cause her concern regarding the integrity of the election and whether the results would be controverted, because of the limited time to prepare for a new election. The election is less than six weeks away. This motion must be heard urgently so the City Clerk has as much time as possible to prepare for the election.

Yours very truly,

Audra Ranalli

Counsel for the Respondent Attorney General of Ontario

cc: All parties in the above-noted applications