

**ONTARIO
SUPERIOR COURT OF JUSTICE**

LARRY PHILIP FONTAINE et. al.

Plaintiffs

- and -

THE ATTORNEY GENERAL OF CANADA, et.al.

Defendants

**FRESH AMENDED REQUEST FOR DIRECTIONS
EDMUND METATAWABIN
AND IAP CLAIMANT K-10106
AND PEETABECK KEWAY KEYKAYWIN ASSOCIATION
NOVEMBER 16, 2016**

ST. ANNE’S IRS SURVIVORS REQUESTING DIRECTIONS

1. This Request for Direction (RFD) is being brought by **Edmund Metatawabin**, a member of the Cree Nation. Metatawabin is the Former Chief of Fort Albany First Nation, Executive member of Peetabeck Keyway Keykaywin Association (St. Anne’s Survivors Association or “PKKA”), and a survivor of St. Anne’s IRS. Metatawabin has sought justice for former students of St. Anne’s IRS since 1992, for the widespread sexual and physical abuse of aboriginal children forced to attend St. Anne’s IRS under federal laws until 1976. Metatawabin was a central aboriginal leader to cause and assist the special investigation of crimes against St. Anne’s children by the Ontario Provincial Police (OPP) from 1992 to 1997 to gather signed statements from 700+ former students, and he gave a signed statement to the OPP about the abuse he suffered himself. Under a pilot ADR project, Metatawabin was the chief negotiator in giving details of the abuse suffered at St. Anne’s for over 100 former students to lawyers acting for Canada and the Catholic Church entities that operated St. Anne’s IRS (“Church Entities”) from 2000 to 2004. Metatawabin did not know until after the IAP deadline in September 2012, that Canada and the Church Entities had not disclosed in the IAP, the documentation generated through various forms

of the justice system, which record the criminal/abusive acts against the children at St. Anne's. Metatawabin has continued to seek to enforce the legal rights of St. Anne's Survivors and he has appeared on behalf of PKKA, Mushkegowuk Council and himself, in RFD proceedings before this Honourable Court, requesting that the Court use its powers to supervise, direct and enforce the IRSSA.

2. IAP Claimant K-10106 is a member of the Cree nation and a survivor of St. Anne's IRS. Claimant K-10106 suffered serious abuse as a child at St. Anne's IRS. Her IAP claim for compensation was denied by the adjudicator at the hearing level but subsequently overturned on Review. Claimant K-10106 was represented in the IAP process by Nelligan O'Brien Payne. Unrevealed to Claimant K-10106, from 1998 until 2004, Nelligan O'Brien Payne had previously been solicitors for the Catholic Church Entities that operated St. Anne's IRS, in both the Pilot ADR project for over 100 former students, and in civil actions in Ontario Superior Court of Justice out of Cochrane and Toronto. The Church entities denied and opposed the abuse claims of former students of St. Anne's. The official IAP material of the Secretariat led Claimant K-10106 to Nelligan O'Brien Payne. Claimant K-10106 was never informed of Nelligan O'Brien Payne had previously acted for the Church Entities. Claimant K-10106 was never informed of all the documents containing similar fact evidence of sexual and physical abuse at St. Anne's IRS, which had been in the possession of Nelligan O'Brien Payne prior to the signing of the IRSSA, when acting for the Church Entities. None of the corroborating documents were filed in evidence, to support the IAP claim of K-10106. The IAP adjudicator was given the false 2008 narrative about St. Anne's, that stated there was no documentation about sexual abuse at St. Anne's. Claimant K-10106 was re-victimized in the IAP hearing, and her claim was denied as not credible. Nelligan O'Brien Payne never sought directions from the court to require federal officials to file the proper disclosure for her IAP hearing and/or Review and/or failed to directly file that evidence to support her IAP hearing and Review.
3. Metatawabin and Claimant K-10106 are the Applicants herein. This RFD is a continuation of the Amended RFD of Mushkegowuk Council and PKKA.

OTHER ST. ANNE'S SURVIVORS FILING EVIDENCE IN SUPPORT OF RFD

4. IAP Claimant H-15019 is a member of the Cree nation, and he has filed a companion RFD, also a former student of St. Anne's IRS. Claimant H-15019 consents to the evidence in his RFD being filed in support of this RFD, as an example of a potential miscarriage of justice, arising out of the failure by federal officials, the Church Entities, and his former legal counsel and/or Wallbridge & Wallbridge, to produce the revised and augmented disclosure for St. Anne's for his IAP hearing and Review. Two IAP adjudicators and/or the Chief Adjudicator took no legal steps to enforce the January 14, 2014 Order of this Honourable Court, for revised disclosure from Canada, and Canada challenged credibility of Claimant H-15019 based on pre-2014 disclosure. Canada convinced the Court to send Claimant H-15019 back for Re-Review based on Canada's promise to make full disclosure. Claimant H-15019 has returned his legal proceedings to the Court because federal officials have failed to file transcripts of civil proceedings expected to contain similar fact evidence to corroborate the evidence of Claimant H-15019. Failure to file the transcripts by Canada is in direct violation of paragraph 6(b) of the January 14, 2014 Order of this Honourable Court.

5. IAP Claimant H-00199 is a member of the Cree nation, and he is a former student of St. Anne's IRS previously represented in the IAP process by Nelligan O'Brien Payne. Claimant H-00199 was not informed that Nelligan O'Brien Payne had previously been solicitors for the Church Entities, in the Pilot ADR project for 100 former students, and in civil actions brought by another 160 former students in Ontario Superior Court of Justice out of Cochrane and Toronto. Claimant H-00199 knows this was a conflict of interest and he would not have retained that firm to represent him. He was never informed of the documents containing similar fact evidence of sexual and physical abuse at St. Anne's IRS, that had been in the possession of Nelligan O'Brien Payne prior to the signing of the IRSSA. No such documents were filed in evidence to support his IAP claim and the adjudicator was given the false 2008 narrative about St. Anne's, which stated there was no documentation about sexual abuse at St. Anne's. The POI reports filed for the IAP hearing for H-00199 were incomplete for each POI. Nelligan O'Brien Payne did not file a request

for directions from the Court to compel federal officials to file the proper disclosure for his IAP hearing and/or failed to directly file that evidence to support his IAP claim.

6. IAP Claimant C-14114 is a member of the Cree nation and former student of St. Anne's IRS. Her IAP claim was denied at the IAP hearing level, in the absence of the revised disclosure and reports for St. Anne's IRS. Canada has never made any admissions about knowledge about sexual abuse happening at St. Anne's IRS and/or lack of reasonable steps by persons in authority for St. Anne's IRS to stop sexual abuse of children, which admissions should be made from the evidence taken from hundreds of former students of St. Anne's in completed examinations for discovery, signed witness statements to the OPP and/or DR decisions. Neither Canada nor the Chief Adjudicator have directly notified Claimant C-14114 that new evidence exists for St. Anne's IRS, that could reverse the denial of her IAP claim on a re-hearing.
7. IAP Claimant S-11733 is a member of the Cree nation, and a former student of St. Anne's IRS. She was previously represented in the IAP process by Wallbridge & Wallbridge. Claimant S-11733 filed a complaint to the Law Society in January 2016 about the legal services received in her IAP claim, which complaint is now under investigation. Federal officials failed to file proper disclosure for her IAP hearing and Wallbridge & Wallbridge did not file a request for directions from the Court to compel federal officials to file the proper disclosure for her IAP hearing and/or failed to directly file that evidence to support her IAP claim .
8. IAP Claimant E-10044 is a member of the Cree nation and a former student of St. Anne's IRS, previously represented in the IAP process by Nelligan O'Brien Payne. He was never told the firm used to act for the Catholic Church officials who operated St. Anne's. Claimant E-10044 sees this as a conflict and he would not have hired this firm to represent him in the private and confidential IAP process, had he been told of that conflict. He was never told that Nelligan O'Brien Payne had documentation about all the abuse at St. Anne's. He was never asked whether Nelligan O'Brien Payne should file a request for directions from the Court to compel federal officials to file the proper disclosure for his IAP hearing and/or failed to directly file that evidence to support his IAP claim

RELIEF REQUESTED

9. The Applicants seek that the following be undertaken by this Honourable Court, through its own agents and under its own powers/means, with participation rights being granted to the Applicants. Alternatively, the Applicants seek the following directly:

- i) For this Honourable Court, as enforcer and supervisor of the Indian Residential School Settlement Agreement (IRSSA), to inquire, investigate and determine whether and why there was breach of the IRSSA by Canada and/or the Catholic Church entities that operated St. Anne's IRS, arising from non-disclosure of documents in their possession, which documents record details of the sexual and physical abuse of approximately 1000 children who attended St. Anne's IRS ("Evidence of 1000 Former St. Anne's Students") and were created through the operations of the Ontario system of justice¹.
- ii) The Order of Mr. Justice Trainor dated August 1, 2003 of this Honourable Court granted access to the lawyers for the parties in the Cochrane civil actions, and adjourned the rights of "non-plaintiffs", to the special investigation documents generated by the OPP into child abuse at St. Anne's IRS. The Applicants seek for this Court to inquire, investigate and determine, for the St. Anne's former students who are the "non-plaintiffs":
 - (1) Who copied the OPP documents, and who has current possession of the OPP documents outside the IAP and TRC;
 - (2) What use was made of those documents and by whom;
 - (3) Why there was non-disclosure of those documents into the IAP and to the TRC;
 - (4) Who should have ownership/possession of those documents presently;

¹ The operations of the Ontario Provincial Police, the Attorney General of Ontario and/or civil proceedings in the Ontario Superior Court of Justice, from 1992 until the signing of the IRSSA.

- (5) Who is entitled to notice hereof, and who shall provide evidence to the Court in this regard.
- iii) That this Honourable Court enforce paragraph 6(b) of the Order of January 14, 2014, to compel federal officials to produce for the IAP in redacted format, the transcripts of examinations for discovery in civil proceedings about sexual and/or physical abuse at St. Anne's IRS conducted prior to the IRSSA being signed; and for agents of this Honourable Court to give appropriate notice to each civil plaintiff of his/her personal option to file his/her transcript with the National Centre for Truth and Reconciliation;
- iv) For this Honourable Court to determine, in the first instance, that for the purposes of the IAP, the documents comprising the Evidence of 1000 Former St. Anne's Students, if relevant to an individual IAP claim, are "reliable and trustworthy" evidence under the IAP, admissible under Appendix VIII and X of the IAP, can be argued by other former students to corroborate an IAP claim and/or can be relied upon by IAP adjudicators as corroborating evidence to make findings of fact, credibility, liability and compensation under the IAP model.
- v) For this Honourable Court to suspend the release and extend the deadline date for filing an IAP claim to each former student of St. Anne's IRS² who gave a signed statement to the Ontario Provincial Police, and who did not file an IAP claim and/or receive compensation in civil proceedings;
- vi) For this Honourable Court and Chief Adjudicator to determine the process by which all St. Anne's survivors who have suffered a miscarriage of justice due to this non-disclosure, will be identified, notified, provided with independent legal advice, and remediated for proper compensation owed under the IAP; suggestions include appointment of the administrative judge or a judicial officer, with necessary powers, to review the revised disclosure and the IAP claims from St. Anne's, to identify and notify those former students who may have been prejudiced by the non-disclosure, and to order appropriate compensation for selected claimant counsel payable by

² this would apply to the estates of deceased former students who were still alive on or after May 30, 2005.

Canada that is not contingent upon outcome, plus appropriate compensation to PKKA personnel for duties assigned to locate, notify and support OPP witnesses in IAP process.

- vii) An Order pursuant to Appendix VIII and X of the IAP, that Canada shall make admissions, or the Chief Adjudicator will make findings of fact, from the criminal proceedings, examinations for discovery, OPP signed witness statements, and/or from previous DR decisions for St. Anne's IRS, with respect to student-on-student abuse, where supervisors and/or church officials knew or ought to have known about the abuse happening at St. Anne's IRS and/or failed to take reasonable steps to stop the abuse.
- viii) Directions from this Honourable Court as to the manner in which to resolve possible conflicts of interest identified in the evidence.
- ix) Directions from this Honourable Court, given IAP confidentiality guarantees, as to the process to seek damages (aside from remedial IAP compensation), for individual or categories of former students of St. Anne's, for breach of contract, breach of fiduciary duty and/or unjust enrichment, such as:
 - (1) Aggravated damages for mental pain and suffering, loss of dignity, etc.
 - (2) Punitive damages;
 - (3) Repayment of legal fees to prevent unjust enrichment;
- x) For this Honourable Court, on the basis that the revised November 2015 narrative should have been known to the Secretariat since 2007, to extend and enforce Article 8.02 of the IRSSA for St. Anne's survivors in the James Bay region, including:
 - (1) to Order Canada to provide funding to PKKA in trust (or a charitable organization to be created by PKKA); PKKA shall employ staff and provide aboriginal cultural health support programs to the survivors of St. Anne's IRS and their families; funding at \$500,000 per year for 3 years; Programs to include:

- (a) Elders Teaching House and outreach support positions; and
 - (b) Youth and Elders Camp; and
 - (c) Albany River Rafting for youth and elders.
- xi) Substantial indemnity legal costs of this RFD at rates, taxes and disbursements consistent with the IAP process. Advance costs of \$50,000.00 to Edmund Metatawabin, including approval for disbursements incurred for Edmund Metatawabin and affiants to attend all public proceedings before the Court on this RFD.
- xii) Preliminary Preliminary Relief:
- (1) An Order granting Metatawabin and IAP Claimant K-10106 and all St. Anne's survivors, immunity from costs being ordered against any one and all St. Anne's survivors, for bringing forward RFD's to this Honourable Court for supervision and enforcement of the IRSSA/IAP, in matters pertaining to or arising from non-disclosure of documentation about sexual and physical abuse of children at St. Anne's IRS.
- xiii) Preliminary Relief:
- (1) An Order to grant standing to Metatawabin to pursue this RFD under the IRSSA, on behalf of the former students of St. Anne's IRS, including estates of former students who have died on or after May 30, 2005;
 - (2) An Order directing the Chief Adjudicator to participate in this RFD;
 - (3) An Order to compel Canada to file immediately into the public record of this RFD, the following documents³ already in the possession of federal officials in the Department of Justice, being the "Evidence of 1000 Former St. Anne's Students" about sexual and/or physical abuse of IRS children:

³ To be filed in a form that is pre-approved by the Court; electronic form of document allowed to be shared with and accessed by the public.

- (a) Documents arising from criminal proceedings against former supervisors of St. Anne's IRS;
 - (b) Pleadings in the public court record from civil actions, issued prior to the signing of the IRSSA, for sexual and/or physical child abuse of former students of St. Anne's IRS, against Canada and/or the Catholic Church entities;
 - (c) In relation to the over 700 former students of St. Anne's, who between 1992 and 1997 gave oral testimony and signed statements to the Ontario Provincial Police about child abuse at St. Anne's, a copy of the handwritten signed statement and the OPP typed version of that same statement; statements in the public record to be redacted as to the name and identity of the students and perpetrators. Metatawabin and PKKA are to receive unredacted copies of signed statements on terms that are just.
- (4) Such further and other preliminary relief as this Honourable Court may deem just.

GROUNDS FOR THE REQUEST FOR DIRECTION

10. There was widespread sexual and physical abuse of aboriginal children forced to attend St. Anne's IRS under federal policy. The suffering, harms, consequences and dysfunction known to flow from severe and prolonged child abuse is evident and continues to be experienced by former students of St. Anne's and their families and communities.
11. From 1992 until the IRSSA was signed in 2006, survivors of St. Anne's IRS exercised their legal rights through the Ontario justice system. Led by Metatawabin and others, about 1000 former students operationalized proper government action, to legally address the widespread sexual and physical abuse of children who were forced under Federal Government policy to attend St. Anne's IRS. Through the efforts and courage of former students, the child abuse was documented by the police and/or proven in numerous criminal and civil legal processes in the Ontario justice system, being the "Evidence of 1000 Former St. Anne's Students".

12. Under an Order of Mr. Justice Trainor of this Honourable Court dated August 1, 2003, on consent from the Ontario Provincial Police, lawyers for the parties in the Cochrane civil actions were given access to unredacted copies of the OPP investigation documents of child abuse at St. Anne's IRS. The lawyers were the Department of Justice for Canada, Nelligan O'Brien Payne for the Church Entities and Wallbridge & Wallbridge for the plaintiffs/former students. The rights of "non-plaintiffs" to that OPP evidence was adjourned *sine die* by this Court. By 2003/2004, the lawyers for the defendants herein had obtained access to all the Evidence of 1000 Former St. Anne's Students.
13. When the IRSSA was signed in May 2006, Canada's copies of the documents comprising the Evidence of 1000 Former St. Anne's Students were stored at the offices of the Department of Justice in Toronto. That documentation was not provided to the officials at Aboriginal Affairs and Northern Development Canada (AANDC) who were responsible to prepare the narrative and POI reports for St. Anne's under the IAP. The 2004 DR narrative for St. Anne's was amended for the IAP in 2008, removing any reference to criminal convictions of former supervisors for child abuse. The 2008 narrative falsely stated there were no documents about sexual abuse at St. Anne's IRS.
14. Mr. Justice Perell of this Honourable Court ordered into the IAP, the production of and summaries for the Evidence of 1000 Former St. Anne's Students, by way of two Orders dated January 14, 2014 and June 23, 2015. Not until November 1, 2015 had the Defendants complied with disclosure and reports obligations of the IRSSA for IAP claims arising out of St. Anne's IRS.
15. The IAP process is confidential and the identity of IAP claimants is supposed to remain confidential. Edmund Metatawabin and PKKA do not have any resources to find the people who have been violated by the non-disclosure. The onus should not be on individual IAP claimants to know about this non-disclosure of documents and the complex legal issues surrounding non-disclosure.
16. IAP Review Decision K-14876 on the IAP secure data base pertains to an unknown St. Anne's survivor, whose IAP claim was denied. The 2015 narrative contains potential corroborating evidence, to support the testimony reported as given by Claimant K-14876 at

her IAP hearing. Claimant K-14876 is an example of the need for a neutral reviewer, who can contact that former St. Anne's student, to advise about re-hearing options available to her and to seek the new evidence. Not all IAP decisions are posted on the IAP data base. The Chief Adjudicator has access to all St. Anne's IAP decisions.

17. Had a truthful Narrative and POI reports, based upon the Evidence of 1000 Former St. Anne's Students, been gathered and submitted to the IRS Adjudication Secretariat, when the IAP process was commenced in 2007, special efforts would have been made by the Secretariat to ensure that former students of St. Anne's IRS (or his/her estate if deceased on or after May 30, 2005) understood the IAP process. Former students who had already provided a signed statement to the Ontario Provincial Police, outlining abuse that could be compensable, were confused as to whether their claim was already filed and/or whether they were not believed because the Ministry of the Attorney General of Ontario did not prosecute on the signed statement.
18. Had a truthful Narrative and the Evidence of 1000 Former St. Anne's Students, detailing child abuse at St. Anne's IRS been available to Health Canada, under Article 8 of the IRSSA, the high need for mental health support professionals and cultural support workers would have been known and related programs should have started by 2007 and been in full operation now and into the future. There has been an epidemic of suicides in the Mushkegowuk Region, which suffers from a serious lack of resources to address the high incidents of mental and physical health harms/consequences arising out of widespread sexual and physical abuse at St. Anne's IRS. Some IAP claimants have been re-victimized by the IAP process due to non-disclosure by the defendants.
19. Had a truthful Narrative and POI reports and source documents been available, reviewed and used by IAP Adjudicators under the IAP model since 2007, some St. Anne's IAP Claimants would not have been denied compensation, or their compensation would have been increased.
20. Under facts known only to the IRS Adjudication Secretariat and to the Defendants, former students of St. Anne's IRS have potentially had their IAP claims wrongly denied or under compensated due to this non-disclosure by the defendants. The Evidence of 1000 Former

St. Anne's Students should have been produced by Canada under Appendix VIII and could have been tendered if relevant by St. Anne's IAP claimants, and used by adjudicators to corroborate IAP claims for abuse at St. Anne's IRS.

21. Health Canada mental health support programs that were to be provided under the IRSSA to St. Anne's survivors, were offered only in cities, and were difficult or expensive or impossible for survivors to access.
22. Mushkegowuk Council, Edmund Metatawabin and cultural support workers in the region know what types of cultural programs will help heal the individuals and communities hardest hit by the child abuse at St. Anne's IRS. Mushkegowuk Council and PKKA need ongoing resources to provide meaningful support and treatment to the survivors of St. Anne's IRS, some of whom were re-victimized by the IAP process. The Keykaywin Conference in 1992 called for Health Canada to provide health support and programs. Now, 24 years later, Health Canada is still not aware of the widespread sexual and physical abuse of so many children, finally summarized in the 2015 narrative for St. Anne's.
23. The leaders in the James Bay region should be entrusted with sufficient funds to expand and develop the healing programs. The program budget of Mushkegowuk Council was cut from \$1 million to \$500,000 in 2014/2015 by the Federal Government.
24. Meanwhile, every St. Anne's IRS student whose rights have been violated and whose IAP claim has been affected (in whole or in part) should have access to justice and to competent claimant counsel to address potential miscarriages of justice arising out of the non-disclosure, and Canada should pay reasonable legal fees, not merely contingent upon the outcome.

EVIDENCE TO BE RELIED UPON

- a) Affidavit of Edmund Metatawabin sworn August 26, 2013
- b) Affidavit of Edmund Metatawabin sworn February 29, 2016
- c) Affidavit of Deputy Grand Chief Rebecca Friday sworn February 24, 2016

- d) Supplementary Affidavit of Edmund Metatawabin sworn April 26, 2016
- e) The Evidence of 1000 Former St. Anne's Students, as requested to be filed by Canada under Preliminary Order above
- f) Evidentiary RFD record of IAP Claimant H-15019 in the IAP confidential format as determined by this Honourable Court on July 5, 2016
- g) Evidentiary RFD record of IAP Claimant C-14114 in IAP confidential format
- h) Affidavit of IAP Claimant K-10106 sworn March 31, 2016
- i) Affidavit of IAP Claimant H-00199 sworn November 16, 2016
- j) Affidavit of IAP Claimant S-11733 sworn November 16, 2016
- k) Affidavit of IAP Claimant E-10044 sworn November 16, 2016
- l) IAP Review Decision for IAP Claimant K-14876.
- m) Evidence already filed in the public record for St. Anne's RFD #1 and St. Anne's RFD #2.
- n) Such further and other evidence as counsel may advise and this Honourable Court may deem appropriate.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 16th day of November, 2016

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Copy of Request for Directions will be also copied

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