

October 23, 2023

VIA EMAIL

Judicial Administrator, Federal Court of Appeal
90 Sparks Street, 5th floor
Ottawa, Ontario K1A 0H9

Dear Madam or Sir,

RE: APR v. AGC and CTA (A-102-20) – Informal Motion for Extending Page Limit

We are counsel for the Applicant. Please bring this letter to Gleason J.A.'s attention. Her Ladyship is seized of all pre-hearing issues, pursuant to the Order of July 19, 2022. This letter is a reply to the Respondent's letter from today.


The Respondent actually underscores the prejudice and inequality of arms that the Applicant is facing. The Respondent stated that "*The CTA intervener is permitted a ten-page affidavit [sic – it should be memorandum] to address their own jurisdiction and no other subject.*"

The Respondent would not need to use any part of its memorandum to deal with the CTA's jurisdiction, whereas the Applicant would need to dedicate a substantial portion of its memorandum to address this issue. Part of the underlying complaint on this Application is that the CTA exceeded its mandate and interfered with the matters between passengers and their credit card companies, and also interfered with provincial consumer protection laws for refunds to passengers.

The Applicant respectfully submits that an extension of the thirty-page limit is clearly warranted in the circumstances.

Should the Court have any directions, or require further submissions, we would be pleased to comply.

Yours truly,

EVOLINK LAW GROUP
SIMON LIN

Barrister & Solicitor

Cc: (1) Mr. Sandy Graham and Mr. Lorne Ptack, counsel for the Attorney General of Canada, and (2) Mr. Kevin Shaar, counsel for the Canadian Transportation Agency