

BY EMAIL

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July 20, 2016

Roger Bilodeau, Q.C.
Registrar
Supreme Court of Canada
301 Wellington Street
Ottawa, ON K1A 0J1

Dear Registrar Bilodeau:

Re: *British Columbia Teachers' Federation, on behalf of all members of the British Columbia Teachers' Federation v. Her Majesty the Queen in Right of the Province of British Columbia (SCC 36500)*

We are in receipt of the thirteen applications for leave to intervene filed with the Court in this matter. This letter will serve as the Appellant's response to those applications.

The Appellant consents to the applications for leave to intervene of the following applicants, whose applications propose useful and different submissions and perspectives which the Appellant submits will assist this Court in this matter:

1. BC Government and Service Employees' Union;
2. Professional Institute of Public Service Alliance of Canada, The Association of Canadian Financial Officers, The Association of Justice Counsel, and The Canadian Association of Professional Employees;
3. Alberta Union of Provincial Employees;
4. Hospital Employees' Union;
5. Canadian Labour Congress;
6. United Nurses of Alberta and Alberta Federation of Labour;
7. Centrale des syndicats du Québec;
8. Public Service Alliance of Canada;
9. National Union of Public and General Employees;

10. Coalition of Ontario Teacher Affiliates (being a defined term for the following Ontario teachers' organizations: L'Association des enseignantes et des enseignants franco-ontariens, Elementary Teachers' Federation of Ontario, the Ontario English Catholic Teachers' Association, and the Ontario Secondary School Teachers' Federation);
11. Canadian Union of Public Employees; and
12. Canadian Association of Counsel to Employers.

The Appellant objects to the application for leave to intervene filed by the Canadian Taxpayers' Federation (the "CTF"). The CTF asserts an interest and position in this appeal that is indistinguishable from that of the Respondent. Before the Court of Appeal, the Respondent relied heavily on its assertion of a right to control public policy and the public purse in the interest of taxpayers. The Respondent is the executive body that represents taxpayers in British Columbia, while the seven Attorneys General intervening as of right in this matter represent taxpayers in other Canadian jurisdictions.

The interest of taxpayers is well-represented by the federal and provincial governments appearing in this case.

All of which is respectfully submitted.

Yours truly,

VICTORY SQUARE LAW OFFICE LLP

per:



Steven Rogers
Law Corporation

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