



Department of Justice
Canada

Ministère de la Justice
Canada

Ontario Regional Office
National Litigation Sector
120 Adelaide Street West Suite #400
Toronto, ON M5H 1T1

Région de l'Ontario
Secteur national du contentieux
120, rue Adelaide ouest, pièce 400
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VIA EMAIL

Our File Number: LEX-500040961

March 5, 2021

Federal Court
90 Sparks Street
Ottawa, Ontario
K1A 0H9

Dear Ms. Craigie:


Re: Court File Nos.: T-208-21, T-263-21, T-265-21, T-269-21, T-280-21, T-282-21, T-283-21, T-287-21, T-291-21, T-292-21, T-293-21, T-295-21, T-296-21, T-297-21, T-298-21, T-299-21, T-300-21, T-311-21, T-312-21, T-313-21, T-314-21, T-315-21, T-316-21, T-317-21, T-318-21, T-321-21, T-322-21, T-323-21, T-324-21, T-327-21, T-331-21, T-332-21, T-333-21, T-344-21, T-345-21, T-352-21, T-364-21, T-365-21, T-370-21, T-382-21

I am writing on behalf of the defendant in the above noted matters, Her Majesty the Queen in Right of Canada (“Canada”), in response to the Court’s March 4, 2021, Direction. I ask that you kindly place this letter before the case management judge, Madam Prothonotary Ayles.

The above-noted claims are virtually identical to the claims referred to in Canada’s letter dated February 11, 2021, and the Court’s Direction dated March 1, 2021, which are attached for the plaintiffs’ convenience.

Canada therefore requests that any file designated as the lead file among those claims also be designated as the lead file among the above-noted claims and any other similar claims that may be filed. Canada also requests that these claims be held in abeyance pending the outcome of the lead file, and that they be bound by any determinations made in the lead file.

Sincerely,



Benjamin Wong
Counsel

Encl.

Canada 

c.c. Duncan Paterson, plaintiff, via e-mail
Dave A Hacker, plaintiff, via e-mail
Lori Longstaff, plaintiff, via e-mail
Michael J Orford, plaintiff, via e-mail
James Vangie Brinkman, plaintiff, via e-mail
Francine Lachance, plaintiff, via e-mail
Christopher Beteau, plaintiff, via e-mail
Stacey Jones, plaintiff, via e-mail
Dyllian Batchelor, plaintiff, via e-mail
Barbara Kelly, plaintiff, via e-mail
Samiullah Khan, plaintiff, via e-mail
Maxime Pollack-Forgues, plaintiff, via e-mail
Brenda Menzies, plaintiff, via e-mail
Rae-Anne L Holden, plaintiff, via e-mail
Wayne A Hawkins, plaintiff, via e-mail
Elya Menzie, plaintiff, via e-mail
Chrystal Hyslop, plaintiff, via e-mail
Gary Hyslop, plaintiff, via e-mail
Charles Nagy, plaintiff, via e-mail
Melissa Rose, plaintiff, via e-mail
Brian Rose, plaintiff, via e-mail
Robert Taylor, plaintiff, via e-mail
Christopher Meek, plaintiff, via e-mail
Stephanie Kelly, plaintiff, via e-mail
Kevin Allen, plaintiff, via e-mail
Heather Brinkman, plaintiff, via e-mail
Igor Mozajko, plaintiff, via e-mail
Melissa Gaudette, plaintiff, via e-mail
Brittany Crystal Mary Joan Macdonald, plaintiff, via e-mail
Phillip Kevin Macdonald, plaintiff, via e-mail
Daniel Grahame Hingley, plaintiff, via e-mail
William Byrnes, plaintiff, via e-mail
Janine Nagy, plaintiff, via e-mail
Jesse Kelly, plaintiff, via e-mail
Giovanni Amadei, plaintiff, via e-mail
Kristine Connell, plaintiff, via e-mail
Kimberly Rolfe, plaintiff, via e-mail
Dean Woods, plaintiff, via e-mail
Betty Ann Young, plaintiff, via e-mail
Joan Hughes, plaintiff, via e-mail



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VIA EMAIL

Our File Number: LEX-500040961

February 11, 2021

Federal Court
180 Queen Street West
Toronto, Ontario
M5V 1Z4

Attention: Registrar

Dear Sir/Madam:

Re: *TURMEL, John v Her Majesty the Queen*, T-130-21
***TURMEL, Raymond v Her Majesty the Queen*, T-138-21**
***ETHIER, Michel Denis v Her Majesty the Queen*, T-171-21**
***INNISS, Biafia v Her Majesty the Queen*, T-208-21**
***BRUNET, Raymond v Her Majesty the Queen*, T-219-21**
***INNISS, Nathanael D v Her Majesty the Queen*, T-212-21**
***ROBINSON-RITCHIE, William Ernest Wayne v Her Majesty the Queen*, T-220-21**
***ROBINSON, Wayne Brian v Her Majesty the Queen*, T-221-21**
***LEADLEY, Trevor J v Her Majesty the Queen*, T-230-21**
***BRAUN, Jason F v Her Majesty the Queen*, T-242-21**

On behalf of the defendant in the above-noted matters, Her Majesty the Queen in Right of Canada (“Canada”), I am writing to request that these matters continue as specially managed proceedings.

The statements of claim in these matters are virtually identical and appear to be based on templates available for download from the website <http://johnturmel.com/kits>. The self-represented plaintiffs allege that Canada’s COVID-19 mitigation measures unjustifiably infringe various *Charter* rights and seek declarations, injunctive relief and permanent personal constitutional exemptions from any COVID-19 mitigation measures.

Canada 

Canada will seek to strike these proceedings on the grounds that they fail to disclose a reasonable cause of action, and will also seek orders that the plaintiffs with unpaid costs awards provide security for costs prior to proceeding.

In light of the common issues, Canada will also be requesting leave to seek this relief by way of a single motion that would be applicable to all of the proceedings, and anticipates that the parties may also require other procedural directions as these claims unfold. Canada submits that case-management is appropriate in these circumstances, would ensure consistent treatment and the just, expeditious and least expensive determination of the claims on their merits. Case-management would also be consistent with the Court's approach to past claims downloaded from the same website as the current claims.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Wong', with a stylized flourish extending to the left.

Benjamin Wong
Counsel

c.c. John Turmel, plaintiff, via courier
Raymond Turmel, plaintiff, via courier
Michel Denis Ethier, plaintiff, via courier
Biafia Inniss, plaintiff, via courier
Raymond Brunet, plaintiff, via courier
Nathanael D Inniss, plaintiff, via courier
William Ernest Wayne Robinson-Ritchie, plaintiff, via courier
Wayne Brian Robinson, plaintiff, via courier
Trevor Leadley, plaintiff, via courier
Jason F Braun, plaintiff, via courier

Federal Court



Cour fédérale

Ottawa, ON
K1A 0H9

March 1, 2021

Applicants

johnturmel@yahoo.com (T-130-21 and T-138-21)

treeoflifemission@yahoo.ca (T-171-21)

biafiaslemon@gmail.com (T-208-21)

pcf911@hotmail.com (T-219-21)

nathan.inniss@protonmail.com (T-212-21)

robinsonritchiewilliam@gmail.com (T-220-21)

omegawayne@gmail.com (T-221-21)

tleadley@telus.net (T-230-21)

thebraunsolution@gmail.com (T-242-21)

Respondent

All files benjamin.wong2@justice.gc.ca

Court Files

T-130-21- *TURMEL, John v Her Majesty the Queen*

T-138-21 - *TURMEL, Raymond v Her Majesty the Queen*

T-171-21 - *ETHIER, Michel Denis v Her Majesty the Queen*

T-208-21- *INNISS, Biafia v Her Majesty the Queen*

T-219-21- *BRUNET, Raymond v Her Majesty the Queen*

T-212-21 - *INNISS, Nathanael D v Her Majesty the Queen*

T-220-21- *ROBINSON-RITCHIE, William Ernest Wayne v Her Majesty the Queen,*

T-221-21- ROBINSON, Wayne Brian v Her Majesty the Queen

T-230-21- LEADLEY, Trevor J v Her Majesty the Queen

T-242-21- BRAUN, Jason F v Her Majesty the Queen

This is to advise of the following Direction of Madam Prothonotary Aylen dated March 1, 2021;

“The parties shall, by no later than March 5, 2021, provide their availability for a case management conference (by Zoom – audio only) during the week of March 8, 2021. The purpose of the case management conference will be to address the following:

(a) Whether the parties consent to T-130-21 being the lead file, with the balance of the files held in abeyance and bound by the outcome of any determinations in T-130-21.

(b) The timetable for the Crown’s motion to strike.

(c) The timetable for the Crown’s motion for security for costs (if necessary).”

Yours truly,

KC
Kathy Craigie
Registry Officer