Case No.: CS-001372

At the British Columbia Human Rights Tribunal

Between:

BRITISH COLUMBIA TEACHERS FEDERATION
OBO CHILLIWACK TEACHERS ASSOCIATION

Complainant

and

BARRY NEUFELD

Respondent

ADJOURNMENT APPLICATION REPLY

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Complainant's Cases Distinguished

1. The starting point is that the Complainant, in attempting to distinguish the Respondent's cases, appears to assume that ***any*** factual difference distinguishes a precedent. However, fact differences do not eliminate abstract principles the Tribunal observes. The ratio that *delay alone does not amount to undue prejudice* remains intact. The ratio that *prejudice to a party in having to proceed to a hearing absent sufficient preparation may outweigh the prejudice to the opposing party by reason of the adjournment* remains intact. The ratio that *where a short adjournment does not itself add significantly to the delay in processing the complaint, no undue prejudice issues* remains intact. The ratio that *prejudice to the party opposing the adjournment will only constitute undue prejudice in extreme circumstances* remains intact. The ratio that *where prejudice is merely speculative, it will not constitute undue prejudice* remains intact. Three pages could not contain the examples of abstract principles that remain intact in this case despite factual differences in Tribunal precedents. The Tribunal is urged to be cautious to distinguish between outcomes that turn solely on facts and ratios that stand alone—the latter of which are numerous.

2. The next problem comes into sharp relief when viewing the context around the propositions the Complainant attempts to isolate for its purposes. Time does not allow a comprehensive review of each and every case in which the Complainant has engaged in this practice, but a few highlights are useful.

3. In *Street v BC (Ministry of Public Safety and Solicitor General) (No. 2)*, 2007 BCHRT 187 [*Street*], the adjournment applicant delayed in applying to the BC Human Rights coalition for over three months. Her failure in this regard is precisely what the Tribunal characterized as a "lack of diligence":

> While she maintained that she would only require a short adjournment as she would contact the Coalition immediately, her lack of diligence in her past efforts to pursue her complaint do not reassure me on this point: see *Street*. Further, Ms. Street first referred to her intention to file an application for adjournment in a pre-hearing conference I held with the parties on November 15, 2006. I referred her to the Tribunal's website to

> find the necessary information and form to use. No application for adjournment was filed (at para 13).

The *Street* Tribunal's finding of a "lack of diligence" stemmed from established facts around the *Street* complainant's proven lack of diligence, not presumptions or guesses.

4. The *Street* complainant also failed to specify the duration of her requested adjournment; unlike in the present case, there was no certainty as to when the *Street* hearing might proceed: "[T]he lack of certainty of the length of an adjournment prejudices the Ministry" (at para 15). Mr. Neufeld is one Tribunal conference away from everyone knowing with certainty when the hearing involving him will proceed.

5. Since the Complainant brings up *Rostas v Llanes and others (No. 3)*, 2007 BCHRT 169 [*Rostas*], it is only fair to look at the entire case and determine what it stands for as a whole.

6. *Rostas* contains a helpful discussion of prejudice, and affirms the Respondent's contention that where prejudice is speculative, it will not constitute undue prejudice:

> 40 The Respondents assert that Mr. Llanes "has been experiencing great stress due to waiting for the resolution of this complaint". In his affidavit, Mr. Llanes states: "I have an ulcer which has recently worsened due to my stress and anxiety levels". Mr MacKay says in his affidavit: "... I believe that the stress associated with waiting for the resolution of this complaint is affecting Mr. Llanes' health and work".
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> 41 Mr. MacKay also states that staff turnover in the restaurant/hospitality industry is high, staff members are transitory, and Cheers has a turnover of almost 75% each year. The Respondents submit that, as a result, witnesses for the Respondents may not be available if the hearing is postponed. Furthermore, they say that the events alleged by Ms. Rostas occurred in 2005, and the memories of witnesses will be impaired with time.
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> 42 On that basis, the Respondents submit that they will be unduly prejudiced by an adjournment of the hearing. I do not agree.
>
> 43 Unlike Ms. Rostas, Mr. Lllanes did not submit a physician's report to support his assertions about the state of his health. Mr. MacKay's

observations about Mr. Llanes' condition are, at best, **speculative and therefore unhelpful**.

44 **The Respondents' assertions with respect to their witnesses are also unpersuasive.** As noted by Ms. Rostas in her Reply, although her Complaint was filed over a year ago, **the Respondents have apparently located nine witnesses** in addition to Messrs. Llanes and MacKay. **There is no reason to expect that their whereabouts will be lost, or their memories will substantially fade**, before the hearing, even if an adjournment is granted. **Measures could presumably be taken by the Respondents and their counsel to ensure that contact coordinates are maintained**, and **witness statements can be recorded to capture their present recollections**.

45 I find that **no <u>undue</u> prejudice** will result to the Respondents by granting the adjournment requested by Ms. Rostas.

7. Even the discrete point for which the Complainant relies on *Rostas* is weak. The Complainant's cited paragraph of *Rostas* describes the *Rostas* complainant as seeking precisely the kinds of targeted legal representation Mr. Neufeld has sought: legal aid-type organizations and a sole practitioner who appears to specialize in a certain type of subject matter.

8. In the *Rostas* complainant's case, those were the BC Human Rights Coalition, CLAS, and barbara findlay. In Mr. Neufeld's case, those were the Justice Centre for Constitutional Freedoms, Freedoms Advocate, the Democracy Fund, and Paul Jaffe. The idea that the Complainant has somehow shown by way of this isolated paragraph that the *Rostas* complainant "assiduously and conscientiously" pursued legal representation and Mr. Neufeld by comparison did not lacks foundation. Certainly this one cherry-picked pinpoint does not get the job done. Further, the *Rostas* tribunal based its decision in part on the complexity of the case:

> 32 With respect to the efforts made by Ms. Rostas to obtain legal representation, I note that the reason she offered for making the First Application in July 2006 was that she was then seeking assistance from the Coalition. She was subsequently represented briefly by Ms. findlay, apparently on a *pro bono* basis, and then by CLAS. Although, for reasons that are not apparent, CLAS did not file a Notice of Appointment until February 2007, Ms. findlay's October 5 letter, which she copied to

> Respondents' counsel, clearly indicates that CLAS had agreed to represent Ms. Rostas in or about early October 2006. This is not a case in which a complainant failed to take active steps to secure legal representation in a timely manner. Ms. Rostas assiduously and conscientiously pursued that objective.
>
> 33 In the matter before me, the particular relevant circumstances include the staffing issues presently confronting the lawyers employed by CLAS. Rather than the usual complement of four, there are currently only one part-time and two full-time lawyers available to represent complainants under the *Code*. This has resulted in the unfortunate and difficult dilemma in which Ms. Rostas and her counsel find themselves; a situation for which neither bears responsibility.
>
> 34 In addition, in the matter before me, there are two factors which were apparently not before the Tribunal in the cases cited by the Respondents. First is the complexity of the issues and the length of the anticipated proceedings at the hearing. As I have noted, the Complaint is against not one, but three Respondents. The possible liability under the *Code* of each Respondent will be relevant, both with respect to the evidence adduced at the hearing and with respect to legal issues arising from the evidence. A total of 17 witnesses will be called to give evidence and be subjected to cross-examination. Compared to a more straightforward complaint, the proceedings will be lengthy and complex.

9. *Rostas* speaks also to the desirability of parties who are clearly overwhelmed by the process being afforded the opportunity to meet their cases in a just and fair manner. Poorly crafted submissions are not necessarily evidence a party is disengaged or refusing to employ diligence. Sometimes a party is simply unable to cope with the volume of materials and obligations coming at him—evidence that he requires counsel:

> 36 The Tribunal has often stated that parties before it do not have an absolute right to be represented by counsel (see, for example, *Gill v. Cheslatta Forest Products and another*, 2005 BCHRT 194 at para. 19; and *Allan v. Jones Emery Hargreaves Swan (No. 2)*, 2005 BCHRT 249, at para. 12). That is so, and many parties, both complainants and respondents, represent themselves in proceedings before the Tribunal; some, with proper preparation, do so very competently and successfully. The Tribunal's Rules also refer to the facilitation of the just and timely resolution of complaints, which indicates the desirability of scheduling hearings as soon as reasonably practical.

> 37 However, there are circumstances where the purposes and objectives of the Code, and the overarching requirement that hearing processes be fair, are best served by granting an adjournment so that a party's interests may be fully and fairly represented at the hearing by counsel. See *Weileby v. LaFleur et al*, 2006 BCSC 1852 (proceedings under the *Manufactured Home Park Tenancy Act*, S.B.C. 2002, c. 77 and the *Judicial Review Procedure Act*, R.S.B.C. 1996, c. 241). In such circumstances, a request for an adjournment will be reasonable. In my view, given the complexity of the pending hearing and the state of Ms. Rostas' health, this is such a case. I am strengthened in that view by having read the Complaint and other documents prepared by Ms. Rostas while she was self-represented, and having conducted the pre-hearing conference at which I made the decision to deny the First Application and at which Ms. Rostas represented herself.

10. *Day v BCIT*, 1998 BCHRT 29 [*Day*] is not an answer to the Complainant's response to Mr. Neufeld's adjournment application for several reasons:

- The Complainant both contacted and retained counsel the day before the hearing to show up **at the hearing** and ask for an adjournment, while the Complainant neither showed up at the hearing nor made herself available to be contacted (at paras 6, 17);

- As late as the first day of said hearing, counsel was unable to confirm that she would be representing the Complainant at the hearing (at para 6);

- Unlike Mr. Neufeld, who has been completely candid about his efforts to retain counsel, including which organizations he has approached and their flat denials of his request, the *Day* complainant made claims about the unavailability of a local legal aid lawyer to review her file which the Tribunal was able to ascertain were untrue (at para 8);

- The Tribunal states, "Undoubtedly had the application been brought at an earlier time it would have been reasonable to request further medical information, however given that this note has been produced at the last minute there is no reasonable way to get that evidence without adjourning the hearing" (at para 11);

- The prejudice to the respondent was not adjourning, rather "adjourn[ing] at this last minute", as distinct from the present case wherein the adjournment application was brought a month out (at para 12);

- In contrast to the present case, there was no way of determining whether the hearing could proceed after a short adjournment of certain duration because the very bases of the adjournment could not be resolved with certainty (at para 12);

- Had the *Day* adjournment application been brought "a week or two weeks ago", "[m]uch of the prejudice…could have been avoided" (at para 13);

- The imminent nature of the hearing, where the opposing party was "here and ready"—meaning already assembled at the hearing—rendered the adjournment prejudicial (at para 15);

- The **last-minute** nature of the request, and the forewarning from the Tribunal concerning **last- minute** adjournment applications: "You should be aware that adjournment applications made at the last minute are difficult to obtain" militated in favour of denying the adjournment (at para 16).

11. Unlike *MacGarvie v Friedmann (No. 3)*, 2007 BCHRT 133 [*"MacGarvie*"], Mr. Neufeld has explained that between the adjournment granted on May 16, 2024 and September 18, 2024, he had been unable to find a lawyer. Mr. Neufeld explained that he could not afford mainstream and large firms; the *pro bono* free expression organizations through which he sought to retain counsel denied him representation; and the one BC free speech sole practitioner he found who might represent him in such a matter at a reasonable cost was unable to do so.

12. The Complainant's claim concerning paragraph 29 of *MacGarvie* is misleading. Contrary to counsel's implied assertion that the respondent in *MacGarvie* "failed to sufficiently

advise the Tribunal of the steps he took" to retain counsel, what *MacGarvie* actually states is that the respondent had not informed the Tribunal of **any** steps he had taken to retain counsel (at para 29). Mr. Neufeld has detailed 5 steps he took to retain counsel, beginning with trying to work something out to keep his original counsel. Mr. Kitchen represents Mr. Neufeld's 6th attempt to retain counsel.

13. The paragraph following the paragraph the Complainant misappropriated further explains that which will become a trend throughout the discussions of the Complainant's case law going forward and what the Tribunal also eludes to in *Day*: the *MacGarvie* matter was becoming **fragmented** as a result of the many adjournments. Additionally, witnesses were **actually** becoming difficult to locate and **actually** losing their memories:

> 30 Even if Mr. Friedmann's request had been reasonable, I would not have granted it on the basis that Ms. MacGarvie would be **unduly** prejudiced by a further adjournment. As indicated in Ms. MacGarvie's submissions, the hearing into this matter has been delayed several times. The hearing set for October 2005 was adjourned; the hearing set for March and April 2006 had to be discontinued, allegedly due to Mr. Friedmann's misconduct; the hearing set for July 2006 was adjourned **after two days of testimony**, due to Mr. Friedmann's illness; and **the continuation of the hearing set for August 2006 was adjourned because of the Tribunal member's illness**. If Mr. Friedmann's request were granted, this would, in effect, be the fifth time the matter has been adjourned. I note that none of the previous adjournments, or this current application, were at the request, or were caused by, Ms. MacGarvie. As a result of the delay, **witnesses are becoming more difficult to locate, and memories are fading**.
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> 31 **Ms. MacGarvie made special arrangements to attend the hearing, including missing shifts at work and missing a job interview.** For at least the third, and perhaps a fourth time, she has applied to the Tribunal for orders for witnesses to appear. These witnesses have arranged their schedules so that they can attend the hearing. I note that **some witnesses had already testified in the earlier hearing and had to be asked to testify again**. Ms. MacGarvie's **counsel made special arrangements and travelled from Alberta** to represent Ms. MacGarvie at the hearing. She advises that, **if the hearing is adjourned, she will be unavailable to represent Ms. MacGarvie until the fall at the earliest**.

14. The next paragraph the Complainant omitted provides further context to the denial of the *MacGarvie* respondent's application for adjournment—being that he brought it **on the day of the hearing**:

> Mr. Friedmann made his application for an adjournment at the beginning of the hearing, rather than filing his application at least two business days before the start of the hearing. He did not explain what information or circumstances forming the basis of the application had come to his attention later, as contemplated by Rule 30(2) and (3). Bringing an application to adjourn at the start of the hearing often means that the other participants and the Tribunal are inconvenienced. Many participants have to travel to attend a hearing or have to miss school or work. As well, Tribunal members could have been assigned to other matters (*MacGarvie* at para 32).

15. *Figliola v BC (Workers' Compensation Board)*, 2009 BCHRT 83 [*Figliola*] is off point. In that case, the Complainant was facing an adjournment of indefinite duration while the Respondent pursued an indefinite number of remedies in a different forum, resulting in fragmentation of the Tribunal process:

> The Complainants further submit that because WCB anticipates that the BC Supreme Court's decision will be appealed, the review process may very well be **ongoing**, in which case the Tribunal should complete its process instead of granting an adjournment based on **anticipated future processes**…Counsel for WCB rightly states that he cannot definitively know if he will receive instructions respecting further appeals or judicial review of these Complaints; however, he has indicated that such might be anticipated. I am not persuaded that a further adjournment, sought for an indefinite period of time, while WCB seeks ongoing review of a preliminary decision is sufficient reason for the Tribunal to further delay its process. It is just this kind of fragmentation of the Tribunal's process that is to be avoided: *C.S.W.U. Local 1611 v. SELI Canada and others (No. 4)*, 2007 BCHRT 442, para. 50 (at paras 24-5).

16. In this light, the penultimate paragraph of *Figliola* affirms that the indefinite nature of the delay and fragmentation of the case is what would render the adjournment unduly prejudicial. In the present case, the length of delay is not ambiguous, not reliant on an unknown number of proceedings at the BC Supreme Court, and not of the kind which threatens to fragment the Tribunal's process.

17. Neither does *Figliola* buttress the Complainant's assertion that "additional weeks or months of delay are very likely to contribute" to "loss of memory" and "willingness to participate", much less that "[i]t is in precisely these circumstances where delay is no longer a matter of 'expediency' and results in undue prejudice". The fact is, ***Figliola says nothing of the sort.***

Complainants Assertions Answered

18. The Complainant complains of insufficient details around the retention of Mr. Kitchen by Mr. Neufeld, but the Complainant was at liberty to cross-examine Mr. Neufeld on the point, which it declined to do despite Mr. Kitchen's explicit offer of making himself and Mr. Neufeld available for cross-examination. Doubtless the fact Mr. Kitchen created a website in early September significantly increased his visibility such that a person like Mr. Neufeld could find him. The Complainant need only have asked.

19. It is unclear on what basis the Complainant assesses that Mr. Neufeld had "ample time to search for **and retain** counsel". All the time in the world is not ample time to retain counsel if no counsel will take the case. Mr. Neufeld wields neither the social clout nor the resources of the Complainant, which would have made all the difference in his ability to retain counsel in the timeframe the Complainant considers ample. But, in Mr. Neufeld's particular circumstances, finding counsel whom he could afford and who was willing to take his case proved a near insurmountable hurdle.

20. Mr. Neufeld discharged his burden of explaining by way of affidavit evidence whom he approached, the fact that those organizations/lawyers declined to represent him, and when he was finally able to retain present counsel. Again, the Complainant had the right to cross-examine Mr. Neufeld on this evidence to satisfy itself of any facts surrounding his efforts to retain and his ultimate retention of counsel, a right it chose not to exercise.

21. If, as the Complainant asserts, "[t]he timing of his efforts to retain counsel is, in the Complainant's respectful submission, highly relevant", the Complainant ought to have exercised its right to cross-examine Mr. Neufeld. That the Complainant waited to assert

without evidence in its response to his adjournment application that Mr. Neufeld's efforts to retain counsel are now "too late to remedy by way of reply" seems rather convenient—for the Complainant.

22. The Complainant points to the insufficiency of Mr. Neufeld's efforts to retain counsel, but the fact is Mr. Neufeld applied to 5 times the number of organizations/lawyers—6, if Mr. Kitchen is included—as anyone reflected in the Complainant's exemplar precedents.

23. As the Complainant acknowledges, Guild Yule, a firm that had been representing Mr. Neufeld and was already conversant in his case required a $150,000 retainer. Mr. Neufeld's likely presumption that any mainstream firm wading in for the first time would command the same or more was eminently reasonable.

24. The Complainant's statement, "The retainer fee of $150,000 is a significant sum. However, this does not speak to Mr. Neufeld's ability to retain alternative counsel in the seven months since his previous counsel's departure" is absurd. The $150,000 retainer required by lawyers who already knew and were somewhat sympathetic to Mr. Neufeld's plight, having fully informed themselves on the file and what he is up against speaks volumes about Mr. Neufeld's ability to retain alternative counsel. It tells of any mainstream law firm being financially out of reach for Mr. Neufeld. It tells of the necessity for Mr. Neufeld to seek out organizations which specialize in this particular kind of work, **which he did**. This one simple statement the Complainant has identified as insignificant contains multitudes.

25. Pretending Mr. Neufeld ought to have contacted every mainstream law firm whose polite lawyers would doubtless bristle at the subject matter of his case, after having already been rejected by the one mainstream law firm that had worked on his case and priced itself out of his reach, is disingenuous.

26. To the Complainant's further statement that "Mr. Neufeld's previous loss of counsel and Mr. Bell's retainer request has already been the basis of one adjournment. Mr. Neufeld cannot rely on Mr. Bell's departure in February as the basis for yet another adjournment

application in September": the Complainant offers no basis on which the longstanding and continuous problem of Mr. Neufeld being unable to retain counsel invalidates his claim that he has, in fact, had a continuously difficult time retaining counsel. If anything, the clearly continuous inability of Mr. Neufeld to retain counsel supports Mr. Neufeld's adjournment application now that he has, after these many months of trying, finally managed to successfully retain counsel.

27. The fact is, Mr. Neufeld approached precisely the appropriate outfits with precisely the reputational intestinal fortitude to take on his case. That they declined is unfortunate, but not his fault.

28. The Complainant's hair-splitting attempt to distinguish the organizations Mr. Neufeld approached from the sort of "law firms" it opines Mr. Neufeld ought to have approached boils down to the Complainant's apparent inability to spot a distinction without a difference. The organizations Mr. Neufeld approached and what they do will be the topic of the next section.

29. The Complainant complains that Respondent counsel has not "sought the availability of Complainant counsel" for new hearing dates. It is not Respondent counsel's practice to begin attempting to coordinate new hearing dates with an opponent who has expressed unwillingness to coordinate new hearing dates by virtue of opposing an adjournment request. Respondent counsel will gladly canvass dates at the hearing of this application and will be prepared to commit to any dates that do not overlap with already-scheduled trials or hearings on which he is counsel.

30. The Complainant complains that "the Respondent has not identified which time periods *he* might be available or unavailable"; however, Respondent counsel stated in the clearest possible terms that he would make every effort to defer to the availability of Complainant counsel and the Tribunal post 6-week adjournment.

31. The Complainant complains that it has no way of knowing whether the three-member Tribunal panel will be available in six weeks for a two-week hearing; however, it is not as though the Tribunal will be obliged to make its adjournment decision in a vacuum. The

Tribunal will be able to immediately determine whether it does or does not have availability, providing full and instant resolution on this point.

32. The Complainant's statement, "Given Mr. Kitchen's busy litigation schedule, we would not presume to know when he may have another two-week opening" is disingenuous, since Mr. Kitchen has already stated a) his busy period is the period prior to the conclusion of the would-be six-week adjournment; and b) he will make every effort to be available on the Tribunal's and opposing counsel's schedules post 6-week adjournment.

33. The Complainant accuses Mr. Neufeld of obliquely referring to prejudice, before itself obliquely referring to prejudice. The difference is that while it is unclear what undue prejudice the Complainant would suffer from a six-week adjournment, Mr. Neufeld's prejudice is patently obvious. He has been without counsel for seven months, during which time he has submitted admittedly inadequate submissions and missed deadlines. Unlike the power wielded by the BCTF, Mr. Neufeld enjoys no institutional support. Mr. Neufeld is elderly, not legally trained, and has been unrepresented. [redacted]

34. [redacted]

35. The Complainant states that the inquiry is not about counsel and the focus is on the Respondent, before making the inquiry about **counsel** for the Complainant rather than any prejudice to the Complainant.

36. The Complainant points to no Tribunal precedent supporting the assertion that "re-preparing witnesses", "reviewing evidence for the hearing" or "repeating work" in and of themselves constitute **undue** prejudice.

37. The rather obvious irony in what counsel for the Complainant argues is she at once believes her client unduly prejudiced by virtue of her own obligation to brush up on material with which she and her client are already familiar, while opining that the Respondent will somehow be less prejudiced by his counsel having not received adequate time to review the material his first time out. It also corroborates the Respondent's submission that an unusually high amount of preparation is in fact required for this case due to both the legal complexity and large volume of documentary evidence and anticipated witness testimony. Additionally, the position that extra work for counsel constitutes undue prejudice directly contradicts the Complainant's position that the focus is not on counsel.

38. The Complainant admits that it "can likely cancel planned leaves of absence for lay-witnesses and expert witness time without incurring too much extra expense". The real problem the Complainant identifies is that it lacks "any assurance the adjournment will actually be of short duration". This is nonsensical. The Tribunal is at liberty to provide such assurance by scheduling the hearing in accordance with the short adjournment the Respondent seeks.

39. It is no answer to say "there is no question that delaying this hearing yet again will amount to undue prejudice for the Complainant", when the Complainant has offered no legally supported reason any **undue** prejudice would be visited upon it. The Complainant has offered no evidence that any individual witness will lose his or her memory or lose his or her willingness to participate. This is what the Tribunal has called "speculative" prejudice, as the Respondent pointed out in his application to adjourn.

Free Speech Organizations Providing *Pro Bono* Legal Representation

40. The Complainant's assertions that the organizations Mr. Neufeld approached are not law firms or deal only with pandemic-related cases and therefore ought not be considered part of his efforts to retain counsel is grasping, to say the least. A cursory glance would have revealed to the Complainant these organizations operate almost exactly the way CLAS does; they simply do not take government money to do it. Further, simply clicking on a tab which reads "What we do"—or some similar invitation—reveals the provision of

legal representation to numerous *pro bono* clients in the precise area in which Mr. Neufeld requires representation (human rights, free expression, *Charter* law, administrative law (upon appeal), *et cetera*).

41. Cherry picking from a website three descriptions in an effort to pretend Mr. Neufeld was not in the right place is, frankly, misleading.

42. The following list contains just some of the clients and cases for whom and which these three organizations have provided the services of lawyers, all accessible in the same place the Complainant found its misleading characterisations. The Respondent will be happy to provide this evidence in affidavit form if the Complainant desires or the Tribunal finds it necessary. It should be noted that Respondent counsel is intimately familiar with these organizations and many of these cases, having directly worked on some of the cases and having been an in-house lawyer for one of the organizations up until 2021.

The Democracy Fund

- **VICTORY: Meghan Murphy speaking event to proceed**
- **"Cancelled" author Meghan Murphy and TDF fight to ensure free speech rights are respected**
- **Pastor Reimer acquitted of all charges related to protest against Drag Queen Story Hour in Calgary**
- **Anti-prayer bylaw charges dismissed against Pastor Derek Reimer**
- **TDF expresses concern over federal government's new censorship bill**
- **TDF tells City of London to reject by-law amendment targeting pro-life expression**
- **Government abandons legislation censoring "dis/misinformation"**
- **TDF and James Kitchen Defend School Board Trustee Monique LaGrange**
- **TDF wins appeal for man who received criminal record as a result of Windsor protest**

- **TDF represents Dr. Hodkinson in misconduct hearing over COVID statements**
- **TDF successfully defends man charged after filming police station from sidewalk**
- **Crown withdraws all charges against peaceful protester arrested, Tasered at Ottawa protest**
- **Calgary withdraws charges in anti-free speech transit by-law case**
- **TDF defends the rights of transit users against anti-free speech transit bylaw**
- **No discipline for Ontario teacher accused of failing to use pronouns in classroom**
- **TDF fights to uphold the right of free expression by defending teenager accused of inciting hatred**
- **Ontario teacher Chanel Pfahl retains her teaching certificate**

Freedoms Advocate

- **Regina Civic Awareness and Action Network (RCAAN) (Legal support to an intervenor in *UR Pride Centre v Government of Saskatchewan, et al*, KBG-RG-01978-2023);**
- **Emanuel Student Discriminated Against by Anti-discrimination Services;**
- **Zaki v. University of Manitoba;**

Justice Centre for Constitutional Freedoms

- **Parent and gender dysphoria groups granted intervenor status in New Brunswick school policy case;**
- **Nurse faces suspension after endorsing safe spaces for biological females;**

- **Quebec teacher challenges gender transition policy in case about compelled speech and freedom of conscience;**
- **Edmonton denies prolife organization booth at KDays in violation of Charter;**
- **Ontario man fights back after Ministry of Transportation censors his billboard;**
- **Transsexual and parent groups support children's rights in SK court case;**
- **Challenging expanding definitions of "hate speech" in Canada;**
- **Teacher silenced for raising concerns about age-inappropriate books;**
- **Transgender person with male genitals sues female beauty pageant for refusing service (Yaniv v. Canada Galaxy Pageants)**