

This is the \_\_\_\_ affidavit  
of Barry Neufeld in this matter  
and was made on 20/SEP/2024

Case No.: CS-001372

*At the British Columbia Human Rights Tribunal*

**In the Matter of British Columbia Teachers Federation obo Chilliwack Teachers  
Association v Barry Neufeld**

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**AFFIDAVIT**

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I, Barry Neufeld, of [REDACTED] British Columbia, SOLEMNLY AFFIRM AND DECLARE  
THAT:

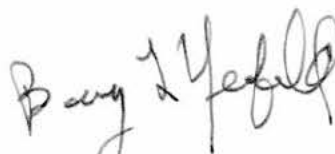
1. I am the Respondent in the above-noted matter. I have knowledge of the matters to which I hereinafter depose, or am advised by counsel, in which case I verily believe the same to be true.
2. This is a complex case with a prodigious volume of materials and multiple witnesses, amounting, respectively, to approximately 74 gigabytes of digital files, including over 500 documents and dozens of hours of school board video footage; and approximately one dozen lay witnesses and at least one expert witness.
3. I was represented by David Bell and Shauna Gersbach of Guild Yule LLP until February 2024, at which point my professional liability insurer discontinued funding my legal representation, and Mr. Bell and Ms. Gersbach withdrew. Mr. Bell and Ms. Gersbach required a \$150,000 retainer to represent me privately, which I could not afford.

4. I was granted an adjournment in June 2024 to retain counsel, but my efforts were unsuccessful until September 18, 2024. Between June 2024 and September 18, 2024, I approached the Justice Centre for Constitutional Freedoms, Freedoms Advocate, the Democracy Fund, and Paul Jaffe. The Justice Centre for Constitutional Freedoms and Freedoms Advocate rejected my case, and I have not heard back from the Democracy Fund to the present day. Mr. Jaffe had hearing date conflicts and was unable to assist me in this matter.
5. On September 18, 2024, I retained James SM Kitchen, a sole practitioner in Alberta.
6. I am informed and do verily believe that Mr. Kitchen has no paralegal; his legal assistant is presently on maternity leave; and he has one associate, a two-year call, with almost no availability until December due to her enrollment in mediation courses and impending hearings.
7. I am informed and do verily believe that, while Mr. Kitchen has no hearing date conflicts between October 21 and November 1, 2024 *per se*, he runs a busy practice with numerous open files and their attendant deadlines and hearings, and therefore has insufficient time to prepare between now and the commencement of the hearing on October 21, 2024.
8. I make this affidavit *bona fide* and for no improper purpose.

AFFIRMED BEFORE ME at Chilliwack,  
British Columbia, Canada this 20<sup>th</sup> day of  
September, 2024.



A Commissioner for Taking Affidavits for  
the Province of British Columbia



Barry Neufeld

