

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HER MAJESTY THE
QUEEN IN RIGHT OF ONTARIO**

Defendants

AMENDED NOTICE OF MOTION

The Haudenosaunee Development Institute will make a motion to a Judge of the Superior Court of Justice on date and time to be determined by the Case Management Judge, Justice Sanfilippo, or soon after that time as the motion can be heard, at the Courthouse, 330 University Avenue, Toronto, Ontario.

PROPOSED METHOD OF HEARING: The motion is to be heard orally.

THIS MOTION IS FOR:

1. An Order:
 - a. joining the Haudenosaunee Development Institute (the “**HDI**”) as a party in this proceeding pursuant to rule 5.03 of the *Rules of Civil Procedure* or, alternatively, granting leave to HDI to intervene as an added party in this proceeding pursuant to rule 13.01 of the *Rules of Civil Procedure*; and
 - b. appointing HDI to represent (i) the Haudenosaunee Confederacy Chiefs Council and (ii) all citizens of the Haudenosaunee Confederacy, pursuant to rule 10.01(1) of the

~~*Rules of Civil Procedure* or, alternatively, an Order authorizing HDI to join the proceeding on behalf of all citizens of the Haudenosaunee Confederacy pursuant to rule 12.08 of the *Rules of Civil Procedure*;~~

2. An order requiring the parties to, within 30 days, provide counsel for HDI all documents exchanged in the proceeding to date, inclusive of productions, discovery transcripts, expert reports, and orders and endorsements of the Court;
3. An order requiring the parties to, within 45 days of satisfaction of paragraph 2, above, attend a case conference to address and seek directions on outstanding procedural issues associated with HDI's joinder or intervention as a party, including pleadings and any required amendments, the production of additional documents (if any), the discovery of additional witnesses (if any), and the timetable for delivery of outstanding expert reports (if any), and preparation for trial;
4. Costs of this motion pursuant to rule 57.03 of the *Rules of Civil Procedure*, if opposed; and
5. Such further and other relief as counsel may advise and as this Honourable Court deems just.

THE GROUNDS FOR THE MOTION ARE:

A. Overview

6. The adjudication of traditional Aboriginal and treaty rights demands the involvement of the collective holders of those rights. Where multiple groups lay claim to such a distinction, those groups must be involved. The present motion seeks just that—involvement of the Haudenosaunee Confederacy, the true collective rights-holders of the treaties at issue in the action.

7. In accordance with traditional Haudenosaunee Law, the governing body of the Haudenosaunee selected the Haudenosaunee Development Institute as representative to advance the interests of the Haudenosaunee Confederacy and its citizens in this litigation. To deny the Haudenosaunee the right to advance their interests, and to deny the Haudenosaunee the right to choose a representative to advance their interests, is to perpetuate colonial rule over Indigenous peoples and ignore the *United Nations Declaration of the Rights of Indigenous Peoples*.

8. Joining HDI as a party to this action, as representative of the citizens of the Haudenosaunee Confederacy appointed by the Haudenosaunee Confederacy Chiefs Council, reflects Canada's commitment to Indigenous interests and the advancement of reconciliation.

B. Procedural Background

9. ***The Action and Claim:*** This action (the "**Action**") was commenced by "The Six Nations of the Grand River Band of Indians" (the "**SNGR**") on March 7, 1995. The SNGR pleads that it is a "band" within the meaning of section 2(1) of the *Indian Act*, RSC 1985 c. I-5 (the "**Indian Act**").

10. The Action seeks, *inter alia*, declarations that the Attorney General of Canada ("**Canada**") and Her Majesty the Queen in Right of Ontario ("**Ontario**" and, with Canada, the "**Defendants**") breached fiduciary and treaty obligations owing to the SNGR, pleaded to be the "predecessors, and the current body, of the Indians known as the Six Nations of the Grand River".

11. The Action also seeks, *inter alia*, declaratory relief and equitable and compensatory damages flowing from such breach(es).

12. ***Initial Pleadings and Discoveries:*** Canada filed a Statement of Defence on January 15, 1996. Ontario filed a Statement of Defence and Crossclaim against Canada on January 22, 1996.

SNGR filed a Reply to the Statements of Defence on July 26, 1996. Canada filed a Statement of Defence and Counterclaim to the Crossclaim of Ontario on October 8, 1997.

13. The parties conducted discoveries in or about 2000.

14. ***Abeyance:*** Beginning in the early 2000s, the Action became inactive with no apparent substantive steps taking place until approximately March 2016. During this period, the Action was formally in abeyance for more than six years.

15. ***Transfer to Toronto and Case Management:*** On November 24, 2017, the Action was transferred from Brantford to Toronto pursuant to the Order of Regional Senior Justice Morawetz.

16. On January 5, 2018, the Action was made subject to case management. Justice Sanfilippo was appointed Case Management Judge. On February 23, 2018, Justice Sanfilippo ordered, *inter alia*, that no motion may be brought in the Action before being considered at a case conference.

17. HDI does not have access to all of the endorsements from the case management process.

18. ***Amended Pleadings:*** SNGR issued a Further Amended Statement of Claim in or about May 2020. The Further Amended Statement of Claim added, *inter alia*, the allegation that its reference to “Six Nations” in the Statement of Claim (and the Reply, referenced below) refers to “the predecessors... of the Indians known as the Six Nations of the Grand River”.

19. Canada and Ontario filed amended Statements of Defence on August 31, 2020. SNGR filed a Reply to the Amended Statements of Defence on September 30, 2020. Canada filed an amended Statement of Defence and Crossclaim to the Crossclaim of Ontario on September 30, 2020.

20. *Trial*: The hearing of the Action is bifurcated between liability and damages. HDI understands that the liability phase of the trial is scheduled to be heard in or about April 2023.

C. Background: The Haudenosaunee

i. *The Haudenosaunee Confederacy*

21. The “**Haudenosaunee Confederacy**” is a political and cultural union of Indigenous peoples that formed a representative government in time immemorial, prior to European contact in North America.

22. The Haudenosaunee Confederacy has been known by many names throughout its long history, including the “Five Nations”, the “Six Nations”, the “Iroquois League”, the “Iroquois Confederacy”, *Hodínöhšö:ni:h* (in English, “Haudenosaunee”, meaning “People of the Longhouse”), and *Wisk Nihohnohwhentsiake* (meaning the “League of the Five Nations”).

23. Initially including the Mohawk, Oneida, Cayuga, Seneca and Onondaga peoples (the “Five Nations”), the Haudenosaunee Confederacy now includes the Tuscarora peoples (*i.e.* the sixth nation, hence “Six Nations”) and numerous others, including, for example, the Delaware, Wyandot, Tutela, Neutral, and Erie peoples.

24. The citizens of the Haudenosaunee Confederacy are the “**Haudenosaunee**” or Six Nations People (this notice of motion uses “Haudenosaunee” to avoid confusion with the definition of “Six Nations” in the Further Amended Statement of Claim, where “Six Nations” is defined as a “band” pursuant to the *Indian Act*).

25. The traditional territory of the Haudenosaunee Confederacy is in present-day New York and southern Ontario. Today, Haudenosaunee people live in, among other places,

present day Ontario (*e.g.* the Grand River Valley and Bay of Quinte), Quebec, New York State, Wisconsin, and Oklahoma.

ii. The Haudenosaunee Confederacy's Governance

26. The Haudenosaunee Confederacy has had a representative government comprised of Chiefs and Clan Mothers that has been governing since the Confederacy's formation in time immemorial. Each "Clan" (an extended family unit) within the Haudenosaunee Confederacy has a Chief, selected by the Clan Mother of that Clan. Upon being selected, a Chief sits at gatherings of the Chiefs, known as "Grand Councils", for life, unless removed by their Clan Mother.

27. The Chiefs and Clan Mothers are considered among the Haudenosaunee to comprise their legitimate governing representatives.

28. Pursuant to Haudenosaunee Law, the Chiefs of the Haudenosaunee Confederacy have the authority of the Haudenosaunee (and its constituent peoples) to enter into treaties and, *inter alia*, and protect the treaty rights and interests of the Haudenosaunee. They have and have had the authority to delegate that authority.

29. The "**Haudenosaunee Confederacy Chiefs Council**" (or the "**HCCC**") is the council of Chiefs of the Haudenosaunee Confederacy that have been continuously holding Council at Ohsweken, Ontario for over 230 years. The Chiefs of the HCCC are empowered by Haudenosaunee Law to make decisions and resolutions concerning the interests of the citizens of the Haudenosaunee Confederacy (*i.e.* the Haudenosaunee), including as related to land within the borders of present-day Canada, which decisions are on behalf of the Haudenosaunee. The HCCC has the authority to represent the interests of the Haudenosaunee Confederacy and its citizens.

iii. *The Haudenosaunee Development Institute*

30. The HDI was established in 2007 pursuant to authorization by the HCCC and was delegated the role of facilitating meaningful engagement on development and infrastructure projects involving Haudenosaunee lands, including but not limited to lands prescribed by the *Haldimand Proclamation* and the *Simcoe Patent*.

31. HDI's engagement process is routinely used by municipalities and developers in southern Ontario as a means of engaging with the HCCC, and therefore with the Haudenosaunee Confederacy and its citizens.

32. The HCCC has delegated authority to HDI to advance the interests of the Haudenosaunee Confederacy in this proceeding in accordance with the traditions, customs, and practices of the Haudenosaunee Confederacy.

iv. *Counterparty to and/or Beneficiary of the Instruments at Issue in the Action*

33. In the early 17th century, the Haudenosaunee Confederacy (through its Chiefs) entered into a series of treaties and diplomatic and economic agreements with European settlers, including the British Crown with whom it formed a relationship called the "Silver Covenant Chain". The "Silver Covenant Chain" symbolizes the nature of the relationship between the Haudenosaunee and the British Crown, which is one based on principles of mutual respect, trust, and friendship.

34. Specifically, the citizens of the Haudenosaunee Confederacy are the only possible counterparty to and/or beneficiary of *inter alia*, the *Haldimand Proclamation* of 1784 (the

“*Haldimand Proclamation*”) and (if lawful) the *Simcoe Patent* of January 1793 (the “*Simcoe Patent*”), the instruments at issue in this Action.

35. During the American Revolutionary War, much of the Haudenosaunee Confederacy allied with the British Crown. When the American Revolutionary War ended, much of the territory of the Haudenosaunee Confederacy fell within the borders of the newly formed United States of America pursuant to the *Treaty of Paris* of 1783.

36. In consideration of the losses sustained by the Haudenosaunee Confederacy and its support of the British forces through the American Revolutionary War, the British Crown agreed to and did provide a tract of land along the Grand River (North of Lake Erie) for the Haudenosaunee Confederacy and its citizens, described in the *Haldimand Proclamation* as follows:

“I have at the earnest desire of many of these His Majesty’s faithful allies purchased a track of land from the Indians situated between the Lakes Ontario, Erie, and Huron, and I do hereby in His Majesty’s name authorize and permit the said **Mohawk Nation and such others of the Six Nations Indians** as wish to settle in that quarter to take possession of and settle upon the banks of the river commonly called Ouse or Grand River...which them and their posterity are to enjoy for ever...” (*emphasis added*)

37. The Action also alleges certain conduct by “Six Nations in council” as early as 1831. These references must be to the Chiefs of the Haudenosaunee, the only “council” at the time. As described below, the SNGR (pleaded as a “band” within the meaning of the *Indian Act*) could not have existed in 1831.

D. The “Six Nations of the Grand River Band of Indians”

i.—The Plaintiff Lacks Standing

~~38. — The identity of the plaintiff, SNGR, is unclear. The statement of claim describes SNGR as “a band within the meaning of the *Indian Act*” and that “the predecessors, and the current body, of the Indians known as the Six Nations of the Grand River together are referred to as” SNGR. This description does not delineate the members nor the characteristics of members who comprise “the Indians known as the Six Nations of the Grand River”.~~

~~39. — If members of SNGR (or their characteristics) are capable of delineation, which HDI alleges is not possible, such members of SNGR require a representation order, as every member of the purported SNGR cannot be readily ascertained, found, or served. The statement of claim does not identify a representative party, nor are there facts pleaded that would support the appointment of a representative party.~~

~~40. — If the plaintiff’s position is that SNGR is in fact a “band” within the meaning of the *Indian Act*, and that registration as a member of that band sufficiently delineates membership in SNGR, then, according to the Government of Canada’s band registry as of April 2022, “Six Nations of the Grand River” has exactly one member.~~

~~41. — If the plaintiff’s position is that the action is being prosecuted by the SNGR “Elected Council” as a representative party, then that entity is not identified in the statement of claim, has not obtained a representation order to represent the SNGR (which, as described above, is not capable of delineation in any event), and it is not representative of the Haudenosaunee, as described below.~~

ii. The SNGR and SNGR “Elected Council” Cannot Represent the Collective Interests at Issue

42. Neither the SNGR nor the SNGR “Elected Council” (if it is involved in the Action) existed at the time of the *Haldimand Proclamation* or the *Simcoe Patent*, both of which significantly predate Canada’s confederation and the *Indian Act*. They also did not exist at the time of the various surrenders alleged in the Action.

43. Neither the SNGR nor the SNGR “Elected Council” (if it is involved in the Action) are representative of the counterparties and/or beneficiaries of the *Haldimand Proclamation* and *Simcoe Patent* (i.e. the Haudenosaunee Confederacy and its citizens).

44. Among other things, the “Six Nations of the Grand River Band of Indians” does not include and cannot include Haudenosaunee who are not members of the pleaded “band”, or who have not agreed to be a member of the pleaded “band”, including any Haudenosaunee who are not registered under the *Indian Act*, for example, by virtue of disenfranchisement.

iii. The SNGR “Elected Council” was Imposed to Displace the HCCC

45. In the face of face of repeated attempts by the HCCC to address land, jurisdiction, and trust fund issues with the Federal Government in the early 1900s, the Federal Government imposed the SNGR “Elected Council” in 1924 pursuant to the Committee of the Privy Council’s Order No. 1629 (“**PC 1629**”).

46. PC 1629 was based upon a report from “Lt. Col. Andrew T. Thompson” which included comments such as:

- a. “It follows that a comparatively small number of old women have the selection of those who are entrusted with the transaction of the business of the Six Nations Indians, while

- the vast majority of the people have nothing what-ever to say in the choice of their public servants.”
- b. “The Six Nations Indians have progressed notably in civilization. They are amongst the most advanced, if not the most advanced, of the Indian tribes, and the Indian Act might very well be amended with respect to them, in consequence.”
 - c. “I would suggest, however, that after the new Council has reached a stage of settled efficiency the Indian Act be changed to enlarge its functions, so that it may more and more approximate to the Council of a white municipality.”
 - d. “there are some eight hundred non-Christian Indians on the Six Nations Reserve. These are commonly called “Pagans”, an appellation which they strongly resent. They call themselves “Deists”, and point to the fact that they worship “The Great Spirit”, whose blessings they invoke, and to whom they return thanks. But the views of this minority, on some subjects at least, could not be considered “moral”, from the Christian standpoint, and especially is this the case with regard to marital relations. The influence of so considerable a minority in a comparatively small population is necessarily large, and no doubt contributes not a little to loose living between the sexes ... There is abundant proof that the Council of Chiefs is quite indifferent to this unfortunate state of affairs, and as their influence is great, it makes the work of the missionaries in this regard all the harder, and largely tends to destroy it altogether.”

47. Pursuant to PC 1629, the first council election was to be held on October 21, 1924 in Ohsweken. On this date, at the direction of the Superintendent of Indian Affairs, the RCMP occupied and appropriated symbols of the Haudenosaunee Chiefs’ authority from the Council

House, including written records and wampum belts, thereby forcibly removing HCCC from the Council House in Ohsweken.

iv. The SNGR and SNGR “Elected Council” are Distinct from the Haudenosaunee Confederacy and HCCC

48. The plaintiff in this action, the SNGR (if it exists), is distinct from and does not represent the Haudenosaunee Confederacy. The SNGR “Elected Council” (if involved in the Action) is distinct from and does not represent the HCCC nor the Haudenosaunee Confederacy.

49. The Haudenosaunee Confederacy has been clear that it is not synonymous with *Indian Act* councils like the SNGR “Elected Council” (if it is involved in the Action). As stated by Chief Sidney Hill, *Tododaho* (a Chief of the Haudenosaunee Confederacy appointed by all of the other Chiefs):

The Circle Wampum makes the line between traditional councils and elected councils clear and distinct; the traditional councils are the original governments of the Haudenosaunee communities/nations handling national affairs, while the elected councils are imposed systems of the Indian Act in Canada and Federal Indian Law in the United States for the administration of colonial policies in each community. Within recent years however, **these elected councils have begun commandeering the distinct symbols, philosophies, and national character of the Haudenosaunee Confederacy — thus misrepresenting themselves to external agencies and the [sic] limiting the significance of the Haudenosaunee as an original Indigenous system of governance.** (*emphasis added*)

50. The distinction between the HCCC and the “Six Nations Elected Council” has been expressly recognized by the Federal Government, including in correspondence from the Honourable Marc Miller directly to the HCCC. Mr. Miller’s formal mandate letter further

acknowledges the historic suppression of Indigenous Governments like the governance of the Haudenosaunee Confederacy:

Work with existing and traditional Indigenous governments and leaders, **whose nations and forms of governance were suppressed and ignored historically by the federal government**, to restore respectful nation-to-nation relations, in the spirit of self-determination, by renewing and updating treaty relationships where they exist, including pre-confederation treaties, and by seeking viable, trusting and respectful relationships where no treaty exists. (*emphasis added*)

E. The Haudenosaunee Confederacy Must be Joined as a Party to the Action

51. Representation of the Haudenosaunee Confederacy's interests in the Action is necessary to enable the Court to adjudicate effectively and completely on the issues.

52. This Action raises important issues regarding the protection of the aboriginal and treaty rights of the Haudenosaunee under section 35 of the *Constitution Act*, including how breaches of those rights and fiduciary obligations by the Crown should be remedied. As the counterparty and/or beneficiary of the *Haldimand Proclamation* and *Simcoe Patent*, and as the collective to whom the Federal and Provincial Crowns owe fiduciary duties, the Haudenosaunee Confederacy has clear and immediate interests in the proceeding. The citizens of the Haudenosaunee Confederacy are entitled to equitable or compensatory damages, should the Court rule accordingly.

53. Haudenosaunee interests are not currently represented in the Action. Neither the SNGR nor the SNGR "Elected Council" (if involved in the Action) represent the interests (nor can they represent the interests) of the Haudenosaunee Confederacy or the Haudenosaunee. The protection of Haudenosaunee interests is, rather, at the heart of the HCCC's mandate, pursuant to Haudenosaunee Law.

54. The identity of the collective rightsholder and beneficiary in this Action is not an issue to be determined on this motion. It must be considered as part of the overall Aboriginal rights treaty claim. The interests of the Haudenosaunee Confederacy must be represented before the Court in making that ultimate determination.

55. Adding HDI as a party to the Action to represent the interests of the Haudenosaunee Confederacy (as a delegate of the HCCC, the Haudenosaunee Confederacy's governing body) will not unduly delay or prejudice the determination of the rights of the parties. At a minimum, adding HDI prevents a multiplicity of proceedings, as any resolution with the SNGR will not be a resolution with the Haudenosaunee Confederacy.

56. This risks significant inefficiency and poses the potential for inconsistent outcomes. If HDI is not added as a party, a separate action to adjudicate the interests of the Haudenosaunee Confederacy will be required, at least as against the Defendants and potentially as against the plaintiff.

57. Adding HDI as a party to the action, as representative of the Haudenosaunee Confederacy and its citizens, as delegated by the HCCC, is consistent with the principles enshrined in the *United Nations Declaration on the Rights of Indigenous Peoples*, including that, *inter alia*:

- a. "Indigenous peoples have the right to access to and prompt decision through just and fair procedures for the resolution of conflicts and disputes with States or other parties ... Such a decision shall give due consideration to the customs, traditions, rules and legal systems of the indigenous peoples concerned and international human rights."

- b. “Indigenous peoples have the right to maintain and strengthen their distinct political, legal, economic, social and cultural institutions, while retaining their right to participate fully, if they so choose, in the political, economic, social and cultural life of the State.”
- c. “Indigenous peoples have the right to the recognition, observance and enforcement of treaties, agreements and other constructive arrangements concluded with States or their successors and to have States honour and respect such treaties, agreements and other constructive arrangements.”
- d. “States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.”

F. HDI is an Appropriate Party to Represent All Citizens of the Haudenosaunee Confederacy in the Action

58. The present circumstances necessitate and make desirable an order that HDI be appointed representative (as delegated by the HCCC) of the HCCC and of ~~for~~ the Haudenosaunee Confederacy and its citizens in the Action.

59. The citizens of the Haudenosaunee Confederacy are the beneficiaries of and/or counterparties to the instruments in the Action, including *Haldimand Proclamation* and *Simcoe Patent*. As discussed in greater detail above, each individual member of the Confederacy will be affected by any judicial determination of Haudenosaunee rights, including those set out in the

Haldimand Proclamation and *Simcoe Patent*. As such, they have a present, future, and contingent interest in the Action.

60. The Haudenosaunee Confederacy is a widespread and populous group numbering over one hundred thousand citizens. It is not feasible to locate, serve, and involve each and every member of the Haudenosaunee Confederacy in this proceeding. It is therefore an appropriate and sufficiently defined group for a representation order.

61. HDI has been chosen and delegated authority by the HCCC to advance the interests of the Haudenosaunee Confederacy in this proceeding, at the HCCC's direction and discretion. As described above, the Chiefs of the HCCC are empowered by Haudenosaunee Law to make decisions and resolutions concerning the interests of the citizens of the Haudenosaunee Confederacy. The HCCC has the authority to represent the interests of the Haudenosaunee. The HCCC also has the authority to delegate the HDI to carry out that authority, at the HCCC's direction. HDI, as a delegate of the HCCC, shares the same interest of the Haudenosaunee Confederacy at large in the outcome of this proceeding.

62. HCCC's selection of HDI to represent and advance Haudenosaunee interests in the Action is also consistent with Haudenosaunee Law and the *United Nations Declaration on the Rights of Indigenous Peoples*.

63. The balance of convenience favours the granting of a representation order instead of individual identification and service upon each member of the Haudenosaunee Confederacy. There is a significant body of evidence that originates from a review of historical documents, the testimony of expert witnesses, and the testimony of elders from the Confederacy. As such, the

individual participation of each member of the Haudenosaunee Confederacy will add little to the record before the trial court.

G. Other Grounds

64. HDI relies on:

- a. The *Rules of Civil Procedure*, RRO 1990, Reg. 194, including rules 1.04, 1.05, 5.03, 10.01, 12.08, 13.01, 50.01, 50.13, 57.03;
- b. Section 138 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43;
- c. Section 35 of the *Constitution Act, 1982*, being Schedule B to the Canada Act 1982 (U.K.), 1982, c. 11, reprinted R.S.C. 1985, App. II, No. 44;
- d. *The United Nations Declaration on the Rights of Indigenous Peoples Act*, S.C. 2021, c. 14; and
- e. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING EVIDENCE will be used at the hearing of the motion:

65. The affidavit of Richard Wayne Hill Sr., affirmed June 10, 2022 and reply affidavit affirmed February 6, 2023;

66. The affidavits of Brian Doolittle, affirmed June 10 and July 6, 2022;

66.1 The affidavit of Colin Martin, affirmed August 31, 2022;

66.2 The affidavits of Aaron Detlor, affirmed August 31, 2022 and February 8, 2023;

66.3 The reply affidavit of Richard Saul, affirmed February 6, 2023;

~~67. The affidavit of *Hohahes* Leroy Hill, to be affirmed;~~

68. The affidavits of a clerk or legal assistant or staff of Gilbert's LLP, including the affidavits of Karizma Defeitas-Barnes sworn November 2, 2022, the affidavit of Thomas Dumigan sworn September 26, 2022, the affidavit of Dylan Gibbs sworn September 27, 2022, the affidavit of Jonathan Martin sworn September 30, 2022, and the affidavit of Carol Fung sworn April 10, 2023;

and

69. Such further and other material as counsel may advise and as this Honourable Court deems just.

DATED this 10th day of April, 2023
~~10th day of June, 2022~~

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SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS
Plaintiff

-and- THE ATTORNEY GENERAL OF CANADA *et al.*
Defendants

Court File No. CV-18-594281

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PROCEEDING COMMENCED AT
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