



CITADEL LAW CORPORATION

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Philip J. Dougan
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File No. 1502-1

June 21, 2021

VIA EMAIL (Emily.Lapper@gov.bc.ca; Jacqueline.Hughes@gov.bc.ca;
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Ministry of Attorney General
Legal Services Branch
1301 - 865 Hornby Street
Vancouver, B.C. V6Z 2G3

Attention: Emily Hopper

Dear Sirs/Mesdames:

**Re: *Canadian Society for the Advancement of Science in Public Policy v. Her Majesty the Queen in Right of the Province of British Columbia et al*,
SCBC Vancouver Registry File No. S210831**

In anticipation of the August 10, 2021 Judicial Management Conference, attached is our Case Plan Proposal.

Please provide your availability in September 2021 for a one day hearing. We are preparing a notice of application regarding the validity of a number of orders made pursuant to the *Emergency Program Act* and *Public Health Act*.

Also, as we understand Dr. Henry's time is in high demand, please provide us with her availability for an examination for discovery in 2022 and early 2023. We want to ensure she is available for two to five days of examinations to be scheduled after the certification hearing. Due to the nature of this action, and at the appropriate time, we will seek a Court order that our client be granted up to 18 hours of examination time as per Rule 7-2(2).

Please provide Dr. Henry's availability, by July 21, 2021, failing which we will seek the Court's direction in this respect.

We also have not received a copy of your response to Justice Crerar's June 2, 2021 Memorandum to Counsel. If you have responded to the Court, please provide us with a copy of your communications.

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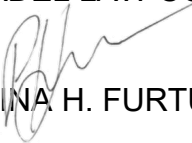


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We look forward to your timely response.

Yours very truly,

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POLINA H. FURTULA