

Christian Naggar et al v The Student Association at Durham College and UOIT

Reina Rexhmataj
on Thursday, March 17, 2016

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Court File No. 94577/16

ONTARIO

SUPERIOR COURT OF JUSTICE

B E T W E E N:

CHRISTIAN NAGGAR, EMILIE HIBBS, JOSHUA HAVILAND,
CHRISTIAN BROWN, KATHLEEN HEPWORTH, ALEXANDRA BROWN
and KASSIA ALMEIDA,

Applicants

- and -

THE STUDENT ASSOCIATION OF DURHAM COLLEGE AND UOIT

Respondent

- - - This is the Cross-Examination of REINA
REXHMATAJ, a representative of the Respondent
herein, on her Affidavits affirmed March 11, 2016
and March 17, 2016, taken at the offices of Neeson
Court Reporting Inc., 141 Adelaide Street West,
11th Floor, Toronto, Ontario, M5H 3L5, on Thursday,
the 17th day of March, 2016.

A P P E A R A N C E S :

Marty Moore, Esq. - for the Applicants.

Andrea J. Sanche, Esq. - for the Respondent.

IN ATTENDANCE AS AN OBSERVER: Christian Naggar.

REPORTED BY: Bonnie Lynn van der Meer, CSR

I N D E X O F P R O C E E D I N G S

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---[Reporter's note: The following indices of undertakings, under advisements and refusals are provided for the assistance of counsel and do not purport to be complete or binding on the parties herein.]

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The questions/requests undertaken are noted by U/T and appear on the following pages/lines: 78:6.

I N D E X O F U N D E R A D V I S E M E N T S

The questions/requests taken under advisement are noted by U/A and appear on the following pages/lines: 85:17.

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I N D E X O F E X H I B I T S

EXHIBIT NO.	DESCRIPTION	PAGE/LINE
"A":	SA Agenda, dated January 15, 2016, with Appendix "A", totalling seven double-sided pages.....	107:5

1 ---Upon commencing at 1:32 p.m.

2 REINA REXHMATAJ; AFFIRMED.

3 CROSS-EXAMINATION BY MR. MOORE:

4 1 Q. Could you state your name for the
5 record?

6 A. Sure. My name is Reina Rexhmataj.

7 2 Q. And could you spell your last name
8 now?

9 A. R-e-x-h-m-a-t-a-j.

10 3 Q. Okay. And, Ms. Rexhmataj, you
11 have sworn an Affidavit in this matter on March
12 11th... Pardon me. You affirmed an Affidavit in
13 this matter on March 11th; correct?

14 A. Correct.

15 4 Q. And the contents of that Affidavit
16 are true, to the best of your knowledge?

17 A. Correct.

18 5 Q. And you have affirmed today to
19 tell the truth, to the best of your ability?

20 A. Correct.

21 6 Q. And the affirmation that you have
22 made today is binding on your conscience?

23 A. Correct.

24 7 Q. And the answers that you provide
25 today are binding on The Student Association of

1 Durham College and UOIT?

2 A. Correct.

3 8 Q. And when I refer to that
4 organization as "SA", you know what I'm speaking
5 about?

6 A. I hope so.

7 9 Q. Okay. So I will be referring to
8 it as "The SA" today.

9 Turning to Paragraph 2 -- actually,
10 strike that.

11 And you have also affirmed today
12 another Affidavit on today's date, March 17th; a
13 Supplemental Affidavit; correct?

14 A. Correct.

15 10 Q. And I may be asking you questions
16 on that Affidavit, as well.

17 A. Okay.

18 11 Q. So beginning first at Paragraph 2
19 of your Affidavit of March 11th, you note your
20 responsibilities.

21 And your responsibilities are listed in
22 the bylaws of The SA; correct?

23 A. Correct.

24 12 Q. Do you know when your position
25 came to be a position within The SA?

1 A. It was voted on the year prior.
2 So this year is 2015-2016, so the year prior, it
3 was created, 2014-'15.

4 13 Q. Okay. Were you a member of The SA
5 Executive at that point in time?

6 A. No.

7 14 Q. Okay. And that's when they
8 established the responsibilities and the position
9 of the VP Equity?

10 A. Correct.

11 15 Q. Okay. And you have a number of
12 responsibilities listed here, including -- I'm
13 directing your attention to sub (c).

14 One of your responsibilities is to
15 ensure that Executives and staff receive
16 anti-oppression and positive space training.

17 What is that anti-oppression training
18 like or what does -- could you describe the
19 anti-oppression training that they receive?

20 A. Absolutely.

21 Anti-oppression is a framework. It
22 sets up guidelines and principles within which any
23 organization may -- may do their activities in.

24 The way it would look like, it would be
25 facilitated. It involves theoretical information

1 as well as activities in order for individuals to
2 understand what anti-oppression principles are.

3 16 Q. Okay. And so what are
4 anti-oppression principles, then?

5 A. Anti-oppression principles; they
6 heavily rely on the idea that we live in a
7 systemic -- we live in a society where systemic
8 discrimination exists and we need -- we need to do
9 our best to mitigate that systemic discrimination.

10 That is its core principle.

11 17 Q. Mm-hmm.

12 A. There are many other principles,
13 as well; however, that is the main fundamental
14 basis of anti-oppression.

15 18 Q. Okay. And so who does teach these
16 courses?

17 A. Anti-oppression courses?

18 19 Q. Yeah.

19 A. Within our -- are you asking
20 specifically within our organization?

21 20 Q. Yeah. Within The SA as fulfilling
22 your responsibility under 2(c)?

23 A. So three anti-oppression workshops
24 plus facilitations throughout the year have been
25 done in order carry through this mandate, and we

1 have done it in conjunction with Outreach
2 Services--

3 21 Q. Okay.

4 A. --which is a service within The
5 Student Association.

6 22 Q. So Outreach Services personnel
7 conduct these -- this training?

8 A. Outreach Service personnel as well
9 as the student/resident advocacy has helped, as
10 well, as well as myself.

11 23 Q. Okay. And so obviously, the
12 directors and staff of The SA are required to do
13 this?

14 A. Yes.

15 24 Q. What other individuals are
16 required to take these anti-oppression training?

17 A. Well, if we look further on, it
18 would be, I believe it says:

19 "Representing The SA on issues
20 regarding discrimination and equity
21 are raised in the Durham College and
22 UOIT community and need to be
23 addressed."

24 Therefore I made -- I made my best
25 efforts in order to have anti-oppression workshops

1 for the student community, as well.

2 25 Q. Okay.

3 A. So in August we had a leadership
4 conference and I made -- I made it possible for
5 anti- -- anti-oppression workshop to be implemented
6 in the leadership conference for the students.

7 26 Q. Okay. And this is a leadership
8 conference for club leaders or for all students?

9 A. For all -- no. This was for clubs
10 and society members.

11 27 Q. Okay. So clubs and society
12 members take this training, as well?

13 A. That's right.

14 28 Q. And how do you determine if
15 someone has passed or, I guess, failed the
16 training?

17 A. The training, the workshop
18 itself,--

19 29 Q. Yeah.

20 A. --it's not on pass or failure
21 because we believe that this is information that in
22 order for you to understand it, you need to
23 constantly be exposed to it.

24 30 Q. Okay. So if a staff member or an
25 Executive of The SA takes the training and, I

1 guess, has a different view than the person giving
2 the training, are they still permitted to just go
3 through so long as they heard the training?

4 R/F MS. SANCHE: No, no, no. This is
5 hypothetical. I'm not going to let her answer it.

6 MR. MOORE: Okay.

7 MS. SANCHE: And I don't see how it's
8 relevant. I don't see any allegations that she
9 hasn't done her job properly or that
10 anti-oppression training hasn't been provided or
11 offered to students.

12 And unless that is an allegation, which
13 again I don't understand, I don't see how these
14 questions are relevant.

15 BY MR. MOORE:

16 31 Q. So, I guess, what constitutes
17 oppression, according to training that you provide?

18 R/F MS. SANCHE: Again, I don't see how
19 that's relevant. The training isn't at issue.

20 MR. MOORE: Well, the concept of
21 oppression and how The SA describes oppression is
22 relevant to this.

23 MS. SANCHE: Well, you're asking about
24 the training which --

25 MR. MOORE: And this is one of the ways

1 in which The SA describes oppression, so I'm
2 interested in how The SA describes oppression.

3 MS. SANCHE: Well, that's a question I
4 understand.

5 I just didn't understand the question
6 you asked,--

7 MR. MOORE: Okay.

8 MS. SANCHE: --so...

9 MR. MOORE: Sure.

10 BY MR. MOORE:

11 32 Q. So if you could describe how --
12 what -- how this training -- how The SA describes
13 oppression in this training and seeks to combat it,
14 I guess, since it's anti-oppression training?

15 A. Okay. Okay. The training. How
16 do -- how does The Student Association combat --
17 training, how do we view it. Oppression --

18 33 Q. I could ask a simple question,
19 perhaps. What constitutes oppression, according to
20 -- I guess according to you in your role as VP
21 Equity?

22 A. Okay.

23 MS. SANCHE: Well, I -- just to
24 interject, I mean, she's... You're asking her not
25 personally, but as her role as SA Equity (sic)?

1 MR. MOORE: Yes.

2 MS. SANCHE: Okay.

3 BY MR. MOORE:

4 34 Q. How does she describe what
5 oppression is to those people that ask you in your
6 role as VP Equity?

7 A. Okay. So there's a few moving
8 parts to -- when it comes to oppression.

9 We start talking about power and
10 privilege that individuals within our society hold,
11 how certain constituencies may hold power,
12 privilege in a different way than other
13 constituencies may hold it.

14 We start talking about the way
15 oppression exists within our society, to try to
16 make it in a tangible way, such as racism,
17 homophobia, transphobia, sexism, hence we made the
18 Unlearn, Relearn, Challenge Campaign for students
19 to understand --

20 --- (Court reporter appeals.)

21 THE WITNESS: ...the Unlearn, Relearn,
22 Challenge Campaign, for students to understand what
23 oppression is and how it exists within our society
24 around us.

25 Hope that answers your question.

1 BY MR. MOORE:

2 35 Q. Okay. So you identify specific
3 groups that have suffered oppression as examples
4 and you provide that, The SA provides that?

5 A. That is one moving part to it.

6 36 Q. Okay.

7 A. That's right.

8 37 Q. And the power and privilege; then
9 you identify other groups that have had power and
10 privilege, as well, in society?

11 In describing what oppression is, you
12 identify groups --

13 A. We define what power and privilege
14 is, what it means historically, what it means and
15 how it exists within our society.

16 38 Q. Okay. And do you provide examples
17 of that existence of that power and privilege, as
18 well?

19 A. Again, we define it. Do we
20 provide examples? Umm. I'm just trying to go
21 through the training itself.

22 39 Q. Sure.

23 A. I don't want to give you any -- in
24 my mind. I don't want to give you any...

25 At this time, I will say I don't know

1 because the training was some time ago, but however
2 we do make sure --

3 THE COURT REPORTER: "...the training
4 was..."?

5 THE WITNESS: ...was some time ago;
6 however, we do make sure to define what power and
7 privilege is and what it looks like.

8 BY MR. MOORE:

9 40 Q. Okay. Does The SA identify male
10 privilege, for example?

11 A. Does it identify male privilege?

12 41 Q. Yeah.

13 A. In what way?

14 42 Q. Does it identify or acknowledge
15 male privilege?

16 A. How would one acknowledge male
17 privilege?

18 43 Q. I guess I'm asking you, in your
19 role as VP, has -- does The SA use those kind of
20 terms?

21 A. "Male privilege"? No. However,
22 we do identify that women are a marginalized group.

23 44 Q. Okay.

24 A. Okay.

25 45 Q. So not so much -- The SA so much

1 doesn't identify the privileged groups, but it does
2 identify the --

3 A. The equity --

4 46 Q. -- the marginalized groups, I
5 guess?

6 A. The equity-seeking groups, such as
7 women.

8 47 Q. Okay. And "equity-seeking" is
9 synonymous with "marginalized", in your view;
10 somewhat synonymous?

11 A. I would say... I would use the
12 term "equity-seeking groups".

13 48 Q. Okay.

14 --- (Court reporter appeals.)

15 THE WITNESS: I would use the term
16 "equity-seeking groups".

17 BY MR. MOORE:

18 49 Q. And in Paragraph 11 of your
19 Affidavit, you refer to "marginalized groups".

20 Is that similar to equity-seeking
21 groups?

22 MS. SANCHE: Do you want to look at
23 the...?

24 --- (Witness reviewing document.)

25 THE WITNESS: Yes.

1 BY MR. MOORE:

2 50 Q. Okay. Do you admit that there may
3 be differences of opinion as to who is a
4 marginalized group?

5 A. Among whom?

6 51 Q. Among people.

7 A. As an Executive, do I admit that?

8 52 Q. Yes.

9 A. Yes. As a VP Equity at The
10 Student Association, I do admit that there may
11 be... Representing 21,000 students out there, I do
12 admit that individuals may not have the knowledge
13 as to what a marginalized group may be and they may
14 differ as to what that looks like.

15 53 Q. Okay. But in your role as VP in
16 Equity, you are seeking to bring them all to the
17 same knowledge of what marginalized groups are?

18 A. My role is outlined here. Number
19 2, I'm seeking to do the eight following things
20 that are listed here.

21 54 Q. Okay. But in regards to
22 responding to the differences, and I think what you
23 described as people not knowing,--

24 A. Mm-hmm.

25 55 Q. --you seek to give them that

1 knowledge; correct?

2 A. Again, I seek to do the eight
3 things that are here. Whether... What your
4 interpretation may be, I can't respond to that.

5 56 Q. Well, I'm asking you a direct
6 question, though.

7 Do you seek to bring people's knowledge
8 of what marginalized groups are, do you seek to
9 bring that knowledge to a higher level for all
10 students across campus in these eight areas?

11 R/F MS. SANCHE: I think she has identified
12 what she does as VP Equity and she has answered
13 your question.

14 BY MR. MOORE:

15 57 Q. And I guess I'm seeking to not
16 just hear it on a theoretical level, but hear it on
17 what she is attempting to communicate to the
18 students.

19 R/F MS. SANCHE: I think she has identified
20 what she's done. I think you're asking a question
21 that has been answered.

22 MR. MOORE: I disagree with that. I
23 don't think my question has been answered.

24 MS. SANCHE: Well, then you can treat
25 it as a refusal and you can--

1 MR. MOORE: Okay.

2 MS. SANCHE: --move on.

3 BY MR. MOORE:

4 58 Q. So The SA acknowledges that there
5 are differences of opinion that exist within the
6 student body at Durham College and UOIT about what
7 constitutes oppression?

8 A. Yes.

9 59 Q. Who is the authority within The SA
10 that decides what constitutes the oppression The SA
11 is seeking to eliminate?

12 A. Sorry. Let me just think.

13 60 Q. Who is the authority within The
14 SA--

15 A. No. I understood.

16 61 Q. --that decides what constitutes
17 the oppression The SA is seeking to eliminate?

18 A. Hmm. As an Executive Committee,
19 we make decisions collabor- -- collaboratively -
20 collectively - clearly can't speak at the moment -
21 collectively. And any decision that is -- or any
22 -- any campaign that is brought forward, it is to
23 be, it is to be agreed upon by the Executive
24 Committee as well as we -- the Executive Committee
25 answers to the Board.

1 62 Q. Okay.

2 A. So no decision is made
3 unilaterally.

4 63 Q. Okay. So it's -- it's the
5 Executive Committee primarily and then with Board--

6 A. With the Board.

7 64 Q. --approval. Okay.

8 And there's -- how many members of the
9 Executive Committee are there?

10 A. So we have the Vice-President of
11 University Affairs --

12 MS. SANCHE: Sorry. As of what date?

13 BY MR. MOORE:

14 65 Q. Of -- yeah. Currently, there are
15 seven members of the Executive Committee; correct?

16 A. After the AGM, we had one more
17 member, the International Student Affairs come --
18 actually, seven. Yes. Seven with the
19 International Student Affairs.

20 66 Q. Okay. And so those seven people
21 evaluate the initiatives and the training and are
22 primarily those who define what the oppression is
23 that The SA is seeking to combat in its
24 initiatives?

25 A. They do evaluate the initiatives.

1 If those initiatives have to do with oppression,
2 then they would evaluate those initiatives, as
3 well.

4 67 Q. Yeah.

5 A. That's right.

6 68 Q. Okay. Another thing that you seek
7 to address is - and I'm looking here at your
8 Paragraph 2(b) - is:

9 "Ensuring that all activities
10 and endorsements of the Board
11 reflect the anti-oppressive and
12 positive space mandate of The SA."

13 What is "positive space"?

14 A. "Positive spa- -- space"... Just
15 one sec.

16 "Positive space"; it is a framework, as
17 well, for..., that provides guidelines to any
18 activities. Umm. Sorry. I'm just -- I'm feeling
19 my knees right now.

20 Provide guidelines within activities to
21 ensure a space safe (sic) -- a safe space is
22 provided.

23 69 Q. Okay. And what does that safe
24 space...? Could you describe the characteristics
25 of that safe space?

1 A. So depending on -- on which
2 organization or where you are, that's a safe space
3 usually set up by the individuals that are
4 participating in the activity.

5 They usually set up ground rules as to
6 what it could look like, such as respecting each
7 other, respecting each other's opinion, not
8 generalizing, things such as understanding that we
9 do -- systemic discrimination does exist within --
10 within our society, and so on and so forth.

11 70 Q. Okay. So those rules; I guess
12 they would restrict the way people communicate in
13 order to maintain a safe space?

14 A. No. They would ensure that the
15 individuals attending that activity are
16 collectively -- are -- are collectively -- are
17 working collectively and set up a space that they
18 all agree upon.

19 71 Q. And if an individual doesn't agree
20 upon the rules for that space?

21 A. Then the group would -- would talk
22 it out as to what the problem may be.

23 72 Q. Okay. And so, it's for the group
24 to come up with their own rules for that space;
25 correct?

1 A. Usually, the ground rules are set
2 as to a safe space. It is usually set for
3 case-by-case basis.

4 However, a positive space; it is in
5 line with the anti-oppressive mandate that we are
6 setting forward.

7 73 Q. Okay. So you mentioned, in
8 describing what safe space is, is avoiding
9 generalizations.

10 Is that an activity or is that a form
11 of expression, a generalization?

12 A. What do you mean?

13 74 Q. Is a generalization a figure of
14 speech? Is it -- does it describe some -- what
15 somebody is expressing?

16 If we prohibit generalizations, are we
17 not prohibiting a form of expression?

18 MS. SANCHE: I don't think she said she
19 was prohibiting generalization.

20 I think she said that depending on the
21 organization or space, they would set up ground
22 rules which could include not generalizing.

23 BY MR. MOORE:

24 75 Q. Right. So if the ground rules say
25 that, 'We won't generalize,' is that saying that

1 that expression won't be allowed or tolerated or
2 encouraged in this space?

3 R/F MS. SANCHE: I don't see how the
4 witness can answer that question, to be honest with
5 you. I mean, it's a hypothetical about what a
6 group would do. And whether she thinks that is
7 preventing something, it's just too hypothetical.

8 BY MR. MOORE:

9 76 Q. So are you saying that the
10 guidelines for safe space can be changed by any
11 group? They are determined by the groups, not by
12 objective criteria?

13 A. Well, usually when these
14 anti-oppressive and positive space workshops are
15 held, they usually, such as I repeated previously,
16 they are usually held by the Outreach Services.

17 They have a facilitator. They
18 understand what the basis and what the mandate of
19 positive space as well as anti-oppression workshop
20 is; therefore, The Student Assoc- -- therefore, the
21 staff as well as anyone facilitating these, they
22 understand what the basis is.

23 77 Q. Okay. And that's the
24 understanding that we are seeking to gain here
25 today.

1 So far, we are not getting very far
2 because I don't know what the guidelines are that
3 The SA has for positive space.

4 What are those guidelines? Can you
5 give me some objective guidelines that The SA has
6 in communicating--

7 A. And I believe I did.

8 78 Q. --what safe space is?

9 A. And I believe I did. I said
10 respect for individuals.

11 79 Q. Okay. Can I stop you there?

12 If someone is communicating something
13 that is determined to be disrespectful to another
14 individual, is that person violating the SA's safe
15 space guideline then?

16 A. Can you repeat the question?

17 80 Q. If someone is being disrespectful
18 to others,--

19 A. Mm-hmm.

20 81 Q. --is that person violating the
21 positive space guideline of The SA?

22 A. In what circumstance? Like...?

23 82 Q. We are talking about guidelines.
24 I am talking about general principles. There can
25 be many different circumstances of disrespect.

1 A. Right.

2 83 Q. If a guideline requires that
3 people be respectful and someone is being
4 disrespectful, is that person violating the
5 guideline?

6 R/F MS. SANCHE: You know what? I think
7 that's just too hypothetical. I don't even really
8 understand. Disrespect; you didn't define that in
9 your scenario--

10 MR. MOORE: Well, they're --

11 MS. SANCHE: --and I also don't think
12 it's relevant, Counsel.

13 MR. MOORE: They're using the term
14 "respectful". This is being applied to my clients.

15 MS. SANCHE: You're not asking about
16 how it's being applied to your clients. You're
17 asking--

18 MR. MOORE: We haven't got that far
19 yet.

20 MS. SANCHE: --about generalizations.

21 MR. MOORE: We haven't got that far
22 yet.

23 MS. SANCHE: Well, I'm not letting her
24 answer generalizations.

25 She has told what she understands

1 positive space to be and what she understands
2 anti-oppression to be.

3 BY MR. MOORE:

4 84 Q. So positive space includes being
5 respectful. What else does it include?

6 R/F MS. SANCHE: She has already answered
7 that.

8 BY MR. MOORE:

9 85 Q. What else does it include?

10 MS. SANCHE: Other than what she has
11 already answered?

12 MR. MOORE: We have to go back and
13 figure out if she added more than respectful.

14 MS. SANCHE: I have a list and there's
15 a transcript.

16 Are you limiting the question to her to
17 answer what else she hasn't said?

18 MR. MOORE: Yeah.

19 MS. SANCHE: Okay.

20 BY MR. MOORE:

21 86 Q. Is there anything you -- what else
22 does positive space include?

23 A. So as long as -- positive space
24 and anti-oppression, as I previously stated, they
25 have a fundamental basis. Umm...

1 87 Q. It appears you're struggling with
2 the question and so maybe I will try and rephrase
3 it.

4 Just sticking to what else is included
5 in the positive space guidelines --

6 MS. SANCHE: Sorry, Counsel. What do
7 you mean by "guidelines"?

8 BY MR. MOORE:

9 88 Q. Positive space was described as a
10 framework that includes guidelines for activities
11 and events.

12 So could you describe what else in --
13 is included in the positive space guidelines, other
14 than the guideline of being respectful?

15 A. Right. So again, as I said, the
16 facilitators who would facilitate this -- this
17 workshop, they would set the ground rules, not as
18 authoritative -- not as one individual;
19 collectively, as a group.

20 And they would -- based on their
21 training, they would ensure that the positive space
22 mandate is kept within that workshop.

23 89 Q. Okay.

24 A. Okay.

25 90 Q. So the workshops are maintained as

1 a positive space then?

2 A. If it is a positive space
3 workshop, then it's maintained.

4 91 Q. Okay. And is it an expectation of
5 The SA that all spaces on the campus will be
6 maintained as a positive space?

7 A. Is it a mandate of The SA that all
8 spaces throughout the campus, to be positive space?

9 92 Q. Yeah. Is that an expectation of
10 The SA and a -- and a--

11 A. Well, I --

12 93 Q. --goal of The SA?

13 A. Well, we can go back to see what
14 the mandate of The Student Association is, which is
15 to tackle, I believe on that point, is to tackle
16 systemic societal oppression and decolonization.

17 Is it -- that could constitute
18 different things. That could constitute providing
19 positive space workshops and anti-oppression
20 workshops.

21 94 Q. Okay. I guess what I'm trying to
22 understand is, at Paragraph 2(b), you say
23 specifically "positive space mandate" is something
24 you are requiring to ensure that all activities and
25 endorsements of the Board follows.

1 A. Right.

2 95 Q. So --

3 A. So I cannot -- sorry. I
4 interrupted you.

5 96 Q. Yeah. So I'm trying to
6 understand, what is that positive space mandate?
7 Did that mean that the SA that is expecting that
8 all spaces on campus will be positive spaces?

9 A. No. As it states in there, it
10 states:

11 "...that all activities and
12 endorsements of the Board..."

13 So any activity that the Board may --
14 may be a part of, it needs to be in line with the
15 anti-oppressive and positive space mandate.

16 97 Q. Okay. And so any endorsements
17 would include any campus clubs that are recognized;
18 correct?

19 A. That's right.

20 98 Q. Okay. So any campus clubs that
21 are recognized must maintain--

22 A. (Coughing) Sorry.

23 99 Q. --a positive space environment?

24 A. That's right.

25 MR. MOORE: Is that on the record?

1 THE COURT REPORTER: (Nodding head.)

2 MR. MOORE: Okay.

3 BY MR. MOORE:

4 100 Q. And that positive space
5 environment is defined collectively, if I
6 understand it, by the individuals who are giving
7 this positive space training.

8 Do I understand that correctly?

9 A. So as I previously stated, all the
10 clubs and the societies receive positive space
11 training in the leadership conference.

12 That training, the information that was
13 based there, they are expected to carry it through,
14 throughout the year.

15 101 Q. They're supposed to carry out
16 their training in their own clubs?

17 A. The information that they have
18 received from the anti-oppression and the positive
19 space training at the leadership conference, they
20 take that information and try on their best ability
21 to -- to --

22 --- (Court reporter appeals.)

23 MS. SANCHE: Try to the best of their
24 ability.

25 THE WITNESS: Oh. And trying, the best

1 of their ability to, to - oh, what is the right
2 word - to, umm, implement that mandate--

3 BY MR. MOORE:

4 102 Q. Okay.

5 A. --or be in line with those -- with
6 that mandate.

7 103 Q. Okay. What happens if a member of
8 a campus club disagrees with some aspect of the
9 guidelines that are given them by the instructors
10 at the positive space training and don't seek to
11 implement that aspect of the training within their
12 campus club?

13 A. What we will --

14 MS. SANCHE: I'm trying to -- sorry.
15 It was me. I didn't understand the question, but
16 it doesn't matter. If you understand it, go ahead.

17 THE WITNESS: Okay.

18 Well, so you're saying if a club member
19 did not understand -- did not carry through the
20 positive space mandate?

21 BY MR. MOORE:

22 104 Q. Yeah. If they disagree with, say,
23 a particular guideline and hold a different
24 principle to be more valuable than that particular
25 guideline that's instructed to them at the training

1 and don't carry out -- don't seek to carry out that
2 guideline within their club's activities, what does
3 The SA do in response to that?

4 MS. SANCHE: Is that a hypothetical or
5 is there a specific example?

6 BY MR. MOORE:

7 105 Q. I'm assuming there's lots of
8 specific examples, but I'm not aware of... I'm
9 guessing it's just, what is the practice of The SA
10 in regards to that?

11 A. Okay. Well, if such an occasion
12 were to arise, the appropriate step would be
13 initially, because all club activities are handled
14 by the Club Coordinator, the Club Coordinator would
15 speak with the Executive Team because the Executive
16 Team does handle the operational issues as well as
17 they do handle issues from the clubs.

18 Then the Executive Team would get
19 together and we would speak on what -- whatever the
20 activity may have been or whatever the problem may
21 have been and, as such, we would take the necessary
22 steps to ensure that it is understood exactly what
23 may have happened, such as meeting with a club or
24 the individuals, and then furthermore, taking it
25 from there.

1 But it's a hypothetical question,
2 unfortunately unless you are talking about
3 something specific, I can tell you exactly what I
4 may have done.

5 106 Q. Okay. And you don't have any
6 examples of you doing that with other clubs, trying
7 to go back and correct activities that they had
8 that were not in compliance with the positive space
9 mandate of The SA?

10 R/F MS. SANCHE: Counsel, I don't see how
11 that's relevant.

12 This is a case about the ratification
13 of a group and I don't see how a hypothetical or a
14 specific example of a completely unrelated incident
15 could, at all, be relevant to this proceeding, at
16 all.

17 MR. MOORE: I think the relevance is
18 that we have the refusal to grant a club status on
19 par with other clubs, based on the fact that some
20 of the activities were disagreed with by The SA.

21 So I'm asking how The SA handles their
22 disagreements with other clubs.

23 MS. SANCHE: Well, Number 1, that's
24 your interpretation and, Number 2, that wasn't
25 exactly what happened. They aren't a campus club.

1 You're asking questions about how she
2 would govern a campus club.

3 MR. MOORE: Yes. The campus club is
4 the issue here.

5 MS. SANCHE: No. The ability to be one
6 is the issue.

7 I disagree on the issue. I don't see
8 the questions about how they would enforce a
9 disagreement within a campus club or what they
10 would do in a circumstance where that might occur
11 as being at all related to the issues in this
12 litigation.

13 MR. MOORE: Okay.

14 BY MR. MOORE:

15 107 Q. In regards to positive space and
16 what it is, is there consideration taken of the
17 value of freedom of expression in discussing what
18 positive space is?

19 A. Can I just repeat your question?

20 108 Q. Sure.

21 A. So do we take freedom of
22 expression in consideration when talking about
23 positive space?

24 109 Q. Yes.

25 A. Absolutely.

1 110 Q. And how so?

2 A. The SA does not seek to censor and
3 does not seek to -- to inhibit the freedom of
4 expression or freedom of speech of any particular
5 group.

6 However, we do recognize that the
7 funding that we receive are from students and that,
8 as is stated in the Affidavit, that the funding is
9 to be prioritized towards equity-seeking groups.

10 111 Q. Okay. So if I am understanding
11 that correctly, the SA is not going to go after
12 students that are expressing themselves on any
13 topic independently of The SA.

14 But if The SA is funding that
15 particular group or activity, then they will be
16 quite interested in what is being expressed by that
17 group?

18 A. I'm sorry. I don't...

19 112 Q. If The SA is funding an
20 activity,--

21 A. Mm-hmm.

22 113 Q. --then The SA wants to establish
23 control over -- over the expression of that or --
24 or has an interest in the expression of that
25 activity, then, and wants to lean it towards

1 equity-seeking groups.

2 Do I understand that correctly?

3 A. I need you to rephrase your
4 question. I'm just confused--

5 114 Q. Sure.

6 A. --a little bit.

7 115 Q. What a group is expressing--

8 A. Mm-hmm.

9 116 Q. --if it is funded by The SA--

10 A. Mm-hmm.

11 117 Q. --is relevant to whether that
12 group will be -- continue to be funded by The SA?

13 A. What... What the mandate of the
14 group may be, what -- its activities that it will
15 be engaging in, as seen in its ratification
16 package, will determine whether that particular
17 group will seek ratification and will be recognized
18 by the Student Association.

19 118 Q. Okay. And if a group that is
20 recognized by the Student Association adopts
21 positions and expresses views that The SA does not
22 consider to be equity-seeking, would that group
23 potentially not be..., have its status renewed as a
24 campus club the next year?

25 A. That's too hypothetical of a

1 question. I... I need a specific example. I
2 can't...

3 119 Q. Does The SA recognize freedom of
4 expression as an important principle that applies
5 to not just independent students, but also to
6 recognized campus clubs?

7 A. Do we recognize freedom of --
8 freedom of expression to clubs that have already
9 been recognized?

10 120 Q. Right.

11 A. Yes.

12 121 Q. And how do you do that?

13 A. We allow them to -- oh, "we allow
14 them" -- they -- they seek to -- in their everyday
15 activities, they can govern themselves in everyday
16 activities.

17 122 Q. Okay. So everyday campus --
18 recognized campus clubs can take positions that
19 would be different than those promoted by The SA?

20 A. Such as?

21 123 Q. You name it.

22 Can a campus club take a position that
23 is different than that of The SA? Are they
24 recognized to have that freedom?

25 A. Absolutely.

124 Q. Okay. Looking at Paragraph 4 of
your Affidavit, it includes a list of statement of
SA's principles. And I understand that these
principles are also in the letters patent, the
supplemental letters patent of The SA?

A. Mm-hmm.

125 Q. Yes?

A. Yes. Yes. Sorry.

MS. SANCHE: It's hard to remember.

BY MR. MOORE:

126 Q. And letter (b) of those principles
mentions.

"...a common framework within
which students can communicate,
exchange information and share
experience, skills and ideas."

Are campus clubs part of that common
framework?

A. Yes.

127 Q. And this is also section, or at
sub (g) that discusses, I think, what we briefly
touched on before in talking about the
anti-oppression mandate.

It talks about The SA's commitment or
basic aim to, at the letter (g):

1 "...to work toward building an
2 environment free of systemic
3 societal oppression..."

4 And, I guess, systemic societal
5 oppression, not to rehash it too much, but it does
6 add a couple of things, "systemic societal" to the
7 word "oppression".

8 Does The SA have a definition of what
9 systemic societal oppression is?

10 A. I believe, if we go to the web
11 page, we have -- so subsection 5... It reiterates
12 the mandate of:

13 "The Student Association is
14 mandated to address issues of
15 systemic and institutional --"
16 --- (Court reporter appeals.)

17 THE WITNESS: Oh. I'm so sorry.

18 "...is mandated to address
19 issues of systemic and institutional
20 oppression at our campus through
21 engagement, mobilization and
22 education."

23 It further goes on to define what
24 equity means and its job, as well as
25 anti-oppression, and why it is important for this

1 anti-oppression -- the reason we challenge these
2 oppression is simple. They perpetuate hierarchies
3 that benefit privileged persons and groups.

4 BY MR. MOORE:

5 128 Q. Okay. And so there is some
6 information given on The SA's, I guess describing
7 some of their mandate?

8 A. Right, which is in line with point
9 (g).

10 129 Q. Okay. And I guess we would agree
11 that along with oppression, people could also
12 disagree with what is systemic societal oppression.
13 People could have differing views on that,
14 including students at the campus?

15 A. We have agreed as to what
16 anti-oppression means; correct, as it states here
17 on the website. We have defined it.

18 And we have defined that it does exist
19 here within the website, and what our mandate is,
20 and that we seek to follow this mandate.

21 130 Q. Right. And--

22 A. Right.

23 131 Q. --we can agree together, here
24 today, that students at UOIT and Durham College
25 could have different definitions of what systemic

1 societal oppression is?

2 A. Well... Students can have
3 different definitions of what systemic societal
4 oppression is?

5 132 Q. Right. Is that -- does The SA
6 recognize that individual students may have
7 differing understandings of what systemic societal
8 oppression is?

9 A. Yes.

10 133 Q. Okay. But in the context of the
11 resources and endorsement of The SA,--

12 A. Mm-hmm.

13 134 Q. --it is the definition of systemic
14 societal oppression which is adopted by the SA
15 Executive and approved by the Board which is
16 enforced through the policies of The SA; correct?

17 A. That's correct.

18 135 Q. And the SA Executive is elected
19 once every year?

20 A. That's correct.

21 136 Q. As well as the Board of Directors?

22 A. That's correct.

23 137 Q. In the same vein, is it possible
24 for people to have different beliefs about when
25 human life is entitled to protection?

1 R/F MS. SANCHE: I don't see that as
2 relevant.

3 MR. MOORE: It's in line with the
4 concept of societal oppression --

5 R/F MS. SANCHE: I don't think it is. I
6 didn't see --

7 MR. MOORE: -- of human life.

8 BY MR. MOORE:

9 138 Q. Does The SA have a view on the
10 concept of abortion?

11 A. We have a view on a... We have a
12 view to embrace a woman's right, of her
13 reproductive rights.

14 139 Q. Okay. Does that include the
15 freedom of a woman to terminate her pregnancy?

16 A. We -- again, we embrace a woman's
17 freedom of choice.

18 140 Q. Freedom of choice to terminate her
19 pregnancy?

20 A. Freedom of choice to do what is
21 best for her.

22 141 Q. Okay. And if that, in her
23 opinion, includes terminating a pregnancy?

24 A. That could possibly include many
25 different things.

1 142 Q. Sure. I'm asking about one
2 specific thing.

3 A. The Student Association embraces a
4 woman's -- a woman's choice.

5 If that constitutes to terminate a
6 pregnancy, then it is her choice.

7 However, we do collectively embrace a
8 woman's freedom of choice.

9 143 Q. Okay. Does The SA view unborn
10 fetuses as a marginalized or equity-seeking group?

11 A. Do we -- I'm sorry?

12 144 Q. Does The SA view unborn fetuses as
13 a marginalized or equity-seeking group?

14 R/F A. I -- I don't know how that's
15 relevant. I'm sorry.

16 145 Q. It's a 'yes' or 'no' question.

17 If you guys have never -- if The SA has
18 never described unborn fetuses as an equity-seeking
19 group or a marginalized group in need of protection
20 from oppression, then you can just say 'no'.

21 You appear to be struggling. Do you
22 need me to rephrase the question or --

23 MS. SANCHE: She can take as long as
24 she wants to answer, Counsel.

25 MR. MOORE: Yeah. I'm just offering

1 to --

2 MS. SANCHE: You don't need to badger
3 the witness.

4 THE WITNESS: We view women as a
5 marginalized group. We have identified them as a
6 marginalized group, just as the Equity Act that has
7 been implemented here in Canada. We view women as
8 a marginalized group, however -- and... Yes.

9 BY MR. MOORE:

10 146 Q. Is that -- am I supposed to
11 understand from that answer, an answer 'yes' or
12 'no' to whether you view unborn fetuses as a
13 marginalized or equity-seeking group?

14 MS. SANCHE: And you said "you", but
15 you mean The SA.

16 MR. MOORE: Yes, yes.

17 MS. SANCHE: Has it identified that as
18 a group?

19 MR. MOORE: Yes, right.

20 R/F THE WITNESS: I... I just -- I just
21 don't think that it's relevant.

22 We are representing students and we
23 seek to identify women as a marginalized group, as
24 an equity-seeking group.

25 BY MR. MOORE:

1 147 Q. Mm-hmm. So you don't think it's
2 relevant whether the unborn fetuses are a
3 marginalized--

4 A. No.

5 148 Q. --group?

6 A. I don't think that question is
7 relevant.

8 I think that women, as I -- we have
9 identified before, are a marginalized group.

10 149 Q. Okay. I think I understand that
11 position now--

12 A. Okay.

13 150 Q. --for sure.

14 And then, The SA's position is that the
15 status of fetuses as a marginalized group is not
16 relevant. Whether they are or not is not relevant.
17 Is that your answer today?

18 A. That is not the -- that is not up
19 for The Student Association to decide.

20 The Student Association decides, since
21 we embrace a woman's freedom of choice and we view
22 women as an equity-seeking group; therefore we view
23 women as a marginalized group, and I can speak for
24 women.

25 151 Q. Okay. But beyond that, The SA

1 doesn't want to take a position on unborn fetuses;
2 whether or not they are a marginalized group--

3 A. Right.

4 152 Q. --or has not taken a position on
5 whether fetuses are a marginalized group?

6 A. I believe that's all I can say for
7 that question.

8 153 Q. So in response to my question
9 whether fetuses are recognized as a marginalized or
10 equity-seeking group by The SA, your response is to
11 say that women are a marginalized and
12 equity-seeking group?

13 A. That's correct.

14 154 Q. Is it possible that the
15 recognition of unborn fetuses being a marginalized
16 or equity-seeking group would impact whether and
17 how to address women as a marginalized and
18 equity-seeking group? Is that a concern in
19 answering this question?

20 A. Sorry. Whether identifying one as
21 marginalized would impact the other?

22 155 Q. (Nodding head.)

23 A. No. Women are seen in our society
24 as a marginalized and as an equity-seeking group;
25 therefore, The Student Association sees women as a

1 marginalized and equity-seeking group.

2 156 Q. Okay. And in regards to the
3 fetuses -- I don't want to be further tedious on
4 this, but in regards to whether fetuses are or are
5 not a marginalized and equity-seeking group,
6 somehow it's related to the fact that women are a
7 marginalized and equity-seeking group that we can't
8 answer whether fetuses are a marginalized or
9 equity-seeking group?

10 MS. SANCHE: And you're saying - sorry
11 - that -- whether The SA, because I think--

12 MR. MOORE: Right. Yes.

13 MS. SANCHE: --that people may differ.
14 So when you say "we", I just to -- so
15 whether The SA has identified fetuses as a--

16 MR. MOORE: Marginalized and
17 equity-seeking group.

18 MS. SANCHE: --marginalized and
19 equity-seeking group, is what you're asking.

20 THE WITNESS: I stand with my answer.
21 I...

22 BY MR. MOORE:

23 157 Q. So today, you cannot give me any
24 answer as to whether The SA has any position
25 concerning the status of fetuses or unborn, whether

1 as a marginalized or equity-seeking group or
2 otherwise?

3 A. In relevance to this case, I can
4 tell you as to different -- as to the reasons why
5 the club ratification was denied.

6 158 Q. That's not --

7 MS. SANCHE: It's okay. He is just
8 asking the question, does The SA consider fetuses a
9 marginalized or equity-seeking group?

10 And the answer, I'm guessing, is 'yes',
11 'no', 'I don't know'?

12 MR. MOORE: That's correct.

13 THE WITNESS: I don't know.

14 BY MR. MOORE:

15 159 Q. Okay. "I don't know."

16 MS. SANCHE: I didn't mean to prompt,
17 Counsel. I'm trying to--

18 THE WITNESS: Sorry.

19 MS. SANCHE: --just--

20 MR. MOORE: That's --

21 MS. SANCHE: --move us on. Sorry.

22 MR. MOORE: I appreciate it, actually,
23 Counsel.

24 MS. SANCHE: Okay.

25 BY MR. MOORE:

1 160 Q. Would it be -- would it surprise
2 you to learn that there are students at UOIT and
3 Durham College who believe that unborn fetuses,
4 unborn children are a marginalized and
5 equity-seeking group?

6 A. No.

7 161 Q. It wouldn't surprise you to know
8 that?

9 A. No.

10 162 Q. So you're aware that some students
11 have that view?

12 A. Yes.

13 163 Q. And so we recognize that there are
14 differences of opinion concerning societal
15 oppression and equity-seeking groups in regards to
16 particularly this issue of abortion; correct?

17 A. I'm sorry. Can you repeat that?

18 164 Q. We understand that there are
19 differences of opinion that exist on the student
20 body about abortion?

21 A. You previously stated that there's
22 a difference of opinion in regards to unborn
23 fetuses; correct?

24 165 Q. Sure. Yes.

25 A. Yes. And that's where I agreed to

1 saying "yes".

2 166 Q. Okay.

3 A. Okay.

4 167 Q. There's a difference of opinion
5 concerning the status of unborn fetuses?

6 A. Correct.

7 168 Q. And following that, there's a
8 difference of opinion among students concerning
9 whether abortion is right or wrong and in what
10 circumstances; correct?

11 A. Yes.

12 169 Q. Okay. So some students would be
13 fine with abortion at any stage in a pregnancy,
14 perhaps?

15 A. Perhaps. I -- yeah.

16 170 Q. Okay. And some students would not
17 be okay with late term or third trimester
18 abortions? That's a possibility?

19 A. Perhaps.

20 171 Q. Okay. And then, some people,
21 which you're probably aware of concerning this
22 case, aren't okay with abortion at any stage?

23 A. Perhaps.

24 172 Q. Sorry?

25 MS. SANCHE: She said, "Perhaps."

1 THE WITNESS: Perhaps.

2 BY MR. MOORE:

3 173 Q. Perhaps? You don't know?

4 A. Sorry. Can you repeat the
5 question?

6 174 Q. Some people take positions--

7 A. Mm-hmm.

8 175 Q. --that abortion is not okay at any
9 stage; yes or no, or do you know?

10 A. Yes, there are people. Yes.

11 176 Q. Okay. And some people take the
12 position that abortion is not okay at later stages
13 of pregnancy?

14 A. Yes.

15 177 Q. And then some people take the
16 position that abortion is okay at any stage?

17 A. Yes.

18 178 Q. Okay. So--

19 A. Yes.

20 179 Q. --essentially we know that there
21 are differences of opinion concerning abortion.

22 A. Yes.

23 180 Q. Okay. But as to which of those
24 positions concerning abortion constitutes
25 oppression against a marginalized or equity-seeking

1 group; namely, women, which of those positions has
2 The SA determined constitutes oppression against
3 women?

4 MS. SANCHE: I don't understand that
5 question, Counsel. I don't think that... I don't
6 think there has been evidence about the SA taking a
7 position on any of those three items. I don't
8 quite understand.

9 BY MR. MOORE:

10 181 Q. Okay. You have been in meetings
11 with The SA while they've been discussing the issue
12 of abortion; correct?

13 MS. SANCHE: Are you talking about the
14 issue of ratifying Speak for the Weak? Because
15 that's what we are here to talk about--

16 MR. MOORE: Yes, yes. That's what
17 we're here to talk about.

18 MS. SANCHE: --and she is not going to
19 answer questions about any other things that the SA
20 discussed, frankly, because they're not relevant.

21 MR. MOORE: Yes. We understand the
22 parameters. Thank you, Counsel.

23 BY MR. MOORE:

24 182 Q. So in the context of the
25 discussion of the application of Speak for the

1 Weak, --

2 A. Mm-hmm.

3 MS. SANCHE: Thank you.

4 BY MR. MOORE:

5 183 Q. --you were in meetings where the
6 abortion issue was brought up; correct?

7 A. Where the Club's ratification was
8 brought up, yes.

9 184 Q. And the abortion issue was
10 discussed in the context of those meetings?

11 A. Umm. It was discussed, yes.

12 185 Q. Okay. Do you recall there being
13 discussed at those meetings whether individuals
14 taking a view on the topic of abortion were
15 violating -- taking a certain view on the topic of
16 abortion were violating The SA's commitment to
17 anti-oppression and therefore should not be granted
18 club status?

19 MS. SANCHE: Counsel, you're talking
20 about people and so on.

21 Are you asking a question about Speak
22 for the Weak? Because that's what -- that's what
23 we are here, discussing.

24 MR. MOORE: Yes, yes.

25 MS. SANCHE: So can you rephrase your

1 question so that it's relevant to the issues in the
2 litigation?

3 MR. MOORE: Sure.

4 BY MR. MOORE:

5 186 Q. Do you recall, in the context of
6 these meetings discussing Speak for the Weak's
7 application, whether The SA determined if views
8 expressed by Speak for the Weak concerning abortion
9 constituted oppression in violation of the
10 anti-oppression framework that The SA has?

11 A. Whether the issue of anti-abortion
12 constituted oppression?

13 187 Q. (Nodding head.)

14 A. And what was the latter part of
15 your question?

16 188 Q. Whether it constituted oppression
17 and, thus, The SA couldn't approve of that club's
18 application for club status?

19 THE WITNESS: Could I have the other
20 one?

21 MS. SANCHE: Oh. You want your...?

22 THE WITNESS: Mm-hmm.

23 MS. SANCHE: I'm just showing the
24 witness her other Affidavit, her Supplementary
25 Affidavit.

1 --- (Witness reviewing document.)

2 THE WITNESS: Okay. As it states at
3 paragraph (a), I raised the issue of whether the
4 ratification of Speak for the Weak would be in line
5 with the mandate of The Student Association,
6 particularly this anti-oppressive principle.

7 And then on this Affidavit, on the one
8 signed today, there's an add-on to that.

9 So we did discuss whether the
10 ratification of Speak for the Weak would be in with
11 the mandate of The Student Association,
12 particularly this anti-oppressive principle.

13 BY MR. MOORE:

14 189 Q. Okay. Was it Speak for the Weak's
15 position on abortion that was the concern as to
16 whether it would be in line with the
17 anti-oppressive standpoint of The SA?

18 A. It's -- as stated in Paragraph 10,
19 it is the mandate that conflicted with the mandate
20 of The Student Association.

21 It's also the mandate of The Student
22 Association that we embrace a woman's legal right
23 to reproductive freedom, and two more reasons as to
24 why the ratification was rejected.

25 190 Q. Yes. So what is -- when you're

1 describing in your Affidavit the mandate of Speak
2 for the Weak, what is it in the mandate
3 specifically that you believe conflicted with these
4 principles of The SA?

5 A. It conflicts with the mandate of
6 The Student Association that we embrace a woman's
7 legal right to reproductive freedom.

8 191 Q. Okay. So what was it in Speak for
9 the Weak's mandate that conflicted with that
10 principle of The SA?

11 A. It did not uphold with this
12 mandate.

13 192 Q. So it did not uphold the
14 reproductive freedom?

15 A. That's correct.

16 193 Q. What in Speak for the Weak's
17 application indicated to you that they did not
18 uphold the reproductive freedom that The SA
19 promotes?

20 A. We believe in women's freedom of
21 choice; therefore, the...

22 THE WITNESS: The application?

23 MS. SANCHE: Counsel, she's asking to
24 look at a document. I don't know if you'll permit
25 her to or if you're asking her recollection.

1 BY MR. MOORE:

2 194 Q. You're fine to look at a document.
3 I'm assuming you're looking for the application of
4 Speak for the Weak.

5 MS. SANCHE: Well, you're asking her
6 about the mandate and yet she doesn't have it in
7 front of her, so...

8 BY MR. MOORE:

9 195 Q. The application of Speak for the
10 Weak is at Tab "A" of the other Affidavit.

11 MS. SANCHE: I don't know if they're
12 the same, are they? We also produced one. It's
13 also here. I don't know which one is...

14 THE WITNESS: Okay. As it states in
15 the group description, that mandate is not in line
16 with the mandate -- oh, sorry -- with the mandate
17 that we are to embrace a woman's legal right to
18 reproductive freedom.

19 BY MR. MOORE:

20 196 Q. Okay. So I'm looking at the group
21 description and I will follow along.

22 If you could guide me to the statements
23 that you had identified or you identify here today
24 that indicate that this mandate is not in line with
25 the SA.

1 Could you point that out to me and read
2 it for me, which statement?

3 A. I would like to also state there
4 were three more reasons as to why the ratification
5 was not accepted.

6 197 Q. Okay. Can we focus on this
7 particular issue right now, the mandate issue, and
8 could you point out within this? And then we can
9 get to the other three reasons.

10 So what in this description of the
11 group, this mandate, indicated to you that it
12 conflicted with The SA's mandate?

13 A. In the group description:

14 "Speak for the Weak exists to
15 advocate for all, equal value,
16 protection of all human life from
17 fertilization to natural death, to
18 support students facing crisis
19 pregnancies and to raise fellow
20 students' awareness and
21 understanding of life issues."

22 [As read.]

23 Also going further,--

24 198 Q. So can I--

25 A. --the mandate --

1 199 Q. --stop you there, if that's all
2 right? Just, is there anything in that, what you
3 just read, that conflicted with The SA's mandate?

4 --- (Witness reviewing document.)

5 THE WITNESS: Well, seeing that The
6 Student Association is to embrace the freedom of a
7 woman's choice, and this exists to advocate for the
8 equal value and protection of all human life, the
9 mandate there seems to be contradictory.

10 BY MR. MOORE:

11 200 Q. And how so? How is it
12 contradictory?

13 A. Because the freedom of choice --
14 The Student Association stands to embrace the
15 freedom of choice of women is clearly not stated
16 here.

17 201 Q. Okay. And so if a club's mandate
18 doesn't state that it embraces the freedom of
19 choice for women, is that the issue?

20 R/F MS. SANCHE: That's a hypothetical.
21 That's not relevant to this specific mandate.

22 BY MR. MOORE:

23 202 Q. So the fact that this specific
24 mandate didn't state that it embraces the freedom
25 of women's choice for reproductive freedom, is that

1 the problem with this mandate?

2 A. Or the rest of the application.

3 203 Q. But specifically with this
4 paragraph, if it had stated somewhere in this
5 paragraph, it exists to advocate for the equal
6 value, protection of all human life from
7 fertilization to natural death and a woman's legal
8 right to reproductive freedom, would that have
9 satisfied The SA?

10 R/F MS. SANCHE: I think that's a
11 hypothetical again.

12 MR. MOORE: She has stated that the
13 reason why this doesn't comply is because it
14 doesn't include that, so I am clarifying that
15 answer.

16 MS. SANCHE: You don't need to clarify
17 it. That was her answer. You're asking now a
18 hypothetical.

19 If it included my name, would it be
20 approved? It's the same to me. It's a
21 hypothetical.

22 This litigation is about why they were
23 denied status--

24 MR. MOORE: Yes.

25 MS. SANCHE: --and I think that's what

1 the answer -- that's what the questions have to be
2 focused on, not a hypothetical, if it were a
3 totally different club on a totally different day
4 with a totally different mandate.

5 BY MR. MOORE:

6 204 Q. Does The SA have a problem with
7 Speak for the Weak seeking to "support students
8 facing crisis pregnancies"?

9 A. We have stated where the problems
10 lie.

11 205 Q. I'm asking you a question.

12 MS. SANCHE: Counsel, I don't think you
13 have to raise your voice.

14 You know, maybe it's time to take a
15 break because I have to go to the washroom--

16 MR. MOORE: Okay. We'll take a break.

17 MS. SANCHE: --and it seems like we're
18 at a loggerhead, so let's just take -- clear our
19 heads for a second.

20 ---Recess at 2:43 p.m.

21 ---On resuming at 2:57 p.m.

22 MR. MOORE: Back on.

23 BY MR. MOORE:

24 206 Q. So following up from the last
25 question, I will just repeat the last question.

1 Does The SA have a problem with the
2 mandate of Speak for the Weak to "support students
3 facing crisis pregnancies"?

4 A. We have a Sexual Health Resource
5 Centre and Outreach Services --

6 --- (Court reporter appeals.)

7 THE WITNESS: I'm sorry.

8 THE COURT REPORTER: Just raise your
9 voice a bit, please.

10 THE WITNESS: Right.

11 We have a Sexual Health Resource Centre
12 and Outreach Services that do handle such cases, so
13 no.

14 BY MR. MOORE:

15 207 Q. Okay. You do not have a problem
16 with it?

17 MS. SANCHE: She said "no".

18 MR. MOORE: Sorry. I'm just trying to
19 understand.

20 MS. SANCHE: I just don't want to
21 repeat questions over and over, and answers.

22 MR. MOORE: Okay.

23 BY MR. MOORE:

24 208 Q. Is The SA okay with the part of
25 Speak for the Weak's mandate that is:

1 "...to raise fellow students'
2 awareness and understanding of life
3 issues"?

4 A. No.

5 209 Q. Thank you.

6 Does or did The SA have a problem with
7 Speak for the Weak's mandate in that it states it
8 seeks to:

9 "...advocate for the equal
10 value and protection of all human
11 life from fertilization to natural
12 death..."? [As read.]

13 THE WITNESS: Can -- can I refuse to
14 answer?

15 MS. SANCHE: No.

16 THE WITNESS: Since the -- the mandate
17 of The Student Association is to embrace the
18 woman's freedom of choice, then yes.

19 BY MR. MOORE:

20 210 Q. Does The SA understand, then, that
21 this -- does The SA believe that this statement to
22 "protect all human life from fertilization to
23 natural death" interferes with a woman's freedom of
24 reproductive choice?

25 A. That our mandate interferes with a

1 woman's freedom of choice?

2 211 Q. No. Let me try that question
3 again.

4 Does The SA understand that this
5 statement--

6 A. Mm-hmm.

7 212 Q. --in the Speak for the Weak's
8 mandate to "protect" -- or:

9 "...and protection of all human
10 life from fertilization to natural
11 death..."

12 A. Mm-hmm.

13 213 Q. Does that aspect of Speak for the
14 Weak's mandate, in the opinion of The SA, interfere
15 with the woman's reproductive freedom?

16 A. Freedom of choice -- do we
17 understand that to be interference with woman's...?

18 214 Q. (Nodding head.)

19 A. Yes.

20 215 Q. Okay. So now that we have gone
21 over what in the mandate conflicts with SA's --
22 what in Speak for the Weak's mandate conflicts with
23 The SA's standpoint, I am hoping we can move on
24 here.

25 In Paragraph 5 of your Affidavit --

1 MS. SANCHE: Counsel, can I just say,
2 it's the student group description, right? We have
3 been saying "mandate", but I don't think that's --

4 THE WITNESS: Right. The student --

5 MS. SANCHE: -- mandate.

6 MR. MOORE: Okay.

7 MS. SANCHE: I just want to clarify.

8 MR. MOORE: Sure.

9 MS. SANCHE: So it says "Student Group
10 Description".

11 BY MR. MOORE:

12 216 Q. Let's clarify that then.

13 Does the student group description set
14 out the mandate of a club?

15 A. So the mandate is -- is decided
16 upon the whole application, whether it's the
17 student group description, whether it is the events
18 they will be participating in, its category -
19 social justice, advocacy and political - that in
20 itself seek to make the mandate of the club.

21 217 Q. Okay. Would it be fair to say
22 that the student group description is the most
23 significant part of the application in reference to
24 determining the mandate of a club?

25 A. Not the most significant, no.

1 They are all equally weighed because,
2 as stated, the denial of the ratification was due
3 to the activities that the club will be
4 participating in, so other -- the other event and
5 activity ideas were taken into consideration, as
6 well.

7 218 Q. Okay. Can The SA disapprove of
8 the activities of a ratified or recognized campus
9 club?

10 A. Can they disapprove of -- of a
11 club that's already ratified?

12 219 Q. Or a club's application? Let's go
13 with a club's application.

14 Can The SA disapprove of the activities
15 in a club's application and still approve the club?

16 A. Can we disapprove of a club's
17 activities and still approve the club?

18 220 Q. Right.

19 A. So that will be decided between
20 the club and the Executives.

21 If there were to be grounds that
22 perhaps the activity would not be taking place,
23 then we would take a case-by-case basis.

24 221 Q. Okay. So in this particular case,
25 if the club -- could The SA have prohibited Speak

1 for the Weak from attending the March Event and
2 still approve them as a campus club? Is that
3 within the power of The SA to do?

4 A. Could we have ratified them and
5 then still prohibited them from attending the
6 activity?

7 222 Q. Yes.

8 A. If it wasn't listed in the thing,
9 then why would we prohibit them?

10 223 Q. I have no idea why or why not you
11 would have prohibited them, but could they have
12 done that?

13 R/F A. It's a hypothetical. I can't be
14 in that position.

15 224 Q. Did The SA have the power to
16 prohibit Speak for the Weak from attending the
17 March For Life Event as a campus club?

18 A. Did we ever?

19 225 Q. Did you have the power to do that?

20 A. They are not a ratified club;
21 therefore, we do not have the mandate to prohibit
22 this group that are not -- is not under the mandate
23 of The SA.

24 226 Q. So you're telling me -- or I don't
25 want to put words in your mouth, but did The SA

1 have the power to ratify Speak for the Weak as a
2 campus club? Would you agree; yes or no?

3 A. Did we have the power to ratify
4 Speak for the Weak as a club? The -- we had the
5 power to deny them or ratify them, yes.

6 227 Q. Okay. Did The SA also have the
7 power to ratify Speak for the Weak as a campus
8 club, but prohibit it from attending the March For
9 Life Event that they proposed?

10 R/F A. I just -- I can't speak for that
11 hypothetical situation.

12 228 Q. I think that was a very real
13 situation and I'm asking about the authority of The
14 SA, as you understand it.

15 A. Right. The Speak for the Weak has
16 not been ratified and as I have been advised, they
17 are still participating within campus. They are
18 doing tabling.

19 So if they wish to attend March For
20 Life, as of right now, not being ratified by The
21 SA, they can attend March For Life.

22 229 Q. Okay. That's not actually what
23 I'm asking.

24 What I'm seeking to understand is the
25 authority of The SA.

1 A. Okay.

2 230 Q. We have already established that
3 The SA had the authority to grant or deny Speak for
4 the Weak's application for club status, right?

5 A. That's right.

6 231 Q. Okay. So I'm wondering if The SA
7 also had the authority to grant Speak for the Weak
8 club status while prohibiting them from attending
9 one of the group's proposed events or activity
10 ideas?

11 A. I -- I don't know.

12 232 Q. You don't know?

13 A. I -- you -- okay. So you're
14 asking, if we were to ratify this club, if they
15 were to be a club at The Student Association, Speak
16 for the Weak, and we went through this ratification
17 process and they didn't put down March For Life as
18 an event, would we -- would we still stop them from
19 going, if they were to go to -- if they wanted to
20 go?

21 233 Q. That's more of a hypothetical, but
22 if--

23 A. Right.

24 234 Q. --you want to answer that, you go
25 ahead.

1 MS. SANCHE: No. She's answering your
2 questions and then she's --

3 MR. MOORE: Okay. That's not my--

4 THE WITNESS: I'm just --

5 MR. MOORE: --actual question.

6 MS. SANCHE: Yeah. I hear two
7 different things, so I think we're just not
8 communicating.

9 BY MR. MOORE:

10 235 Q. Okay. Well, let me try again.

11 Speak for the Weak had an application
12 to be a campus club with the SA.

13 The SA had the power to approve Speak
14 for the Weak?

15 A. Mm-hmm.

16 236 Q. Okay.

17 A. Or deny it.

18 237 Q. Or deny, yes.

19 A. That's right.

20 238 Q. Okay. So Speak for the Weak also
21 submitted a list of "event and activity ideas",
22 right,--

23 A. That's right.

24 239 Q. --with their application.

25 MS. SANCHE: (Coughing) Excuse me.

1 BY MR. MOORE:

2 240 Q. Did The SA have the authority to
3 grant the application for club status while denying
4 that club the right to do any one of those
5 activities as a campus club?

6 A. Like a conditional acceptance?

7 241 Q. Sure.

8 A. Do we have the power -- I'm sorry,
9 I'm not understanding. It has been a really long
10 day for me.

11 Do we have the power to accept their
12 ratification and prohibit them from going here?

13 242 Q. Yes. Correct. That's the
14 question I'm asking.

15 A. You keep smiling and I don't know
16 why.

17 243 Q. Oh, I'm sorry. I'm just happy
18 that we are understanding it together now.

19 A. Okay. Again, like, this is a
20 hypothetical situation.

21 The situation, as it stands, we have
22 denied them.

23 244 Q. Okay. Can I stop you there?

24 MS. SANCHE: Is it possible that we
25 undertake to answer it? I don't know if it's the

1 situation. I -- or if you want to move on and come
2 back? I don't know. I just...

3 MR. MOORE: Yeah.

4 MS. SANCHE: I feel like we are--

5 MR. MOORE: Mm-hmm.

6 MS. SANCHE: --stuck.

7 MR. MOORE: Sure.

8 MS. SANCHE: And I want to --

9 MR. MOORE: Yeah.

10 MS. SANCHE: You know, we want to
11 answer. I just want to make sure it's... Would it
12 be easier if I undertake to provide the answer,
13 Counsel? I just want to really...

14 MR. MOORE: Yeah.

15 THE WITNESS: I'm sorry. I don't mean
16 to make this harder.

17 MS. SANCHE: Maybe something in writing
18 would be --

19 MR. MOORE: Well, let me -- let me just
20 -- we'll just put that one on the shelf for a
21 moment.

22 MS. SANCHE: Okay. I do not mean to
23 interfere. I just feel that we're not...

24 MR. MOORE: Okay. Would it be all
25 right if I just asked one -- one question--

1 MS. SANCHE: You ask whatever you want
2 to ask.

3 MR. MOORE: --in the same line here?

4 MS. SANCHE: Ask whatever you want to
5 ask.

6 BY MR. MOORE:

7 245 Q. I feel like we almost had the
8 understanding connect in that "a conditional
9 acceptance" of their application, you used that
10 term, so I'm going to try to use that term and
11 hopefully this communicates what I'm trying to ask.

12 Would it be possible for The SA to
13 grant Speak for the -- would it have been within
14 the powers of The SA for them to have granted Speak
15 for the Weak club status conditioned on them not
16 attending the March For Life? Would that have been
17 within the powers of The SA?

18 A. The powers of The SA, of the
19 Executive Team, we do have the power to deny or
20 ratify a club.

21 If... If they were to come forward,
22 because one of the reasons why the Club was denied
23 was for their attendance at the March For Life, if
24 further meetings were to be held as to what -- as
25 to how possibly this could have been -- the

1 ratification could have been accepted, then we
2 would have accepted those.

3 However, as - I'm sorry, I know I'm not
4 making this easy - however, as it stands, this was
5 one of the reasons out of all the four reasons why
6 this club was denied.

7 246 Q. Okay.

8 A. Okay.

9 247 Q. And --

10 A. And The Student Association has
11 the power to deny or ratify a club.

12 248 Q. Okay. So if they would have come
13 forward and offered to not attend the March For
14 Life--

15 A. No. That's --

16 249 Q. --Event, then what your answer
17 described is that there would have been further
18 meetings and potentially The SA could have ratified
19 them at that point?

20 A. We would have had further
21 meetings. We would have had further discussions
22 with the Club Executives and then seen -- like,
23 reached an understanding.

24 250 Q. Okay. Would it have been possible
25 for Speak for the Weak to then have modified their

1 application? Would that have been a possibility in
2 those further meetings?

3 A. Clubs can ratify. Executives can
4 re-ratify. They can apply for ratification--

5 251 Q. Okay. Would --

6 A. --again.

7 252 Q. In the -- in the period that we
8 are talking about here, back in 2015, September or
9 August,--

10 A. Right.

11 253 Q. --would it have been possible for
12 Speak for the Weak to then have amended their
13 application for club status, to not include that in
14 the process of discussions with The SA?

15 A. Executives can re-ratify, yes.
16 They can reapply for ratification.

17 254 Q. Okay. I think we are having a
18 little bit of a communication impasse on the point.

19 Once a club submits its application, if
20 they made an error on their application in
21 submitting it,--

22 A. Mm-hmm.

23 255 Q. --can they go back and change that
24 application?

25 A. Yes.

1 256 Q. Okay.

2 MS. SANCHE: You're talking about an
3 error, Counsel, so she answered that question.

4 BY MR. MOORE:

5 257 Q. I'm talking about an error, yes.

6 A. Yes.

7 258 Q. So that was correct--

8 A. Yes.

9 259 Q. --for an error?

10 A. Absolutely.

11 260 Q. And if a club wishes to go back
12 and change their application for a different
13 reason, other than an error; maybe they changed
14 their mind about something.

15 A. Mm-hmm.

16 261 Q. Can they go back and change their
17 application?

18 A. Yes.

19 262 Q. Okay.

20 A. Yes.

21 I hope that was clear. I'm sorry.

22 MS. SANCHE: It's okay.

23 BY MR. MOORE:

24 263 Q. Do you know if The SA notified
25 Speak for the Weak of their right to go back and

1 change their application?

2 A. I don't know. I wasn't there--

3 264 Q. Okay.

4 A. --at that meeting.

5 265 Q. Can we look at Paragraph 5 of your
6 Affidavit?

7 A. Yeah.

8 266 Q. Just let me get to the right
9 section here.

10 And Paragraph 5 includes some
11 statements from The SA's website which are included
12 in full in Exhibit "A" to your Affidavit; correct?

13 A. That's right.

14 267 Q. Do you know how long those
15 statements have been on The SA's website?

16 A. I don't know. They were this
17 year, implemented this year, but I cannot give you
18 a specific date.

19 268 Q. So they have been up there with --
20 some time within the last three months, they have
21 been put on the website?

22 A. Three -- March... I believe prior
23 to December, but I'm not entirely sure.

24 269 Q. So by "this year", you mean this
25 school year?

1 A. This year, like -- that's right.
2 2015-2016 academic year.

3 270 Q. Okay. Could I ask that you find
4 out and let us know when those statements were put
5 up on the website?

6 U/T MS. SANCHE: Yeah.

7 MR. MOORE: Thank you.

8 BY MR. MOORE:

9 271 Q. The last statement on page 3 of
10 your Affidavit, it's a quote from the website, and
11 it says:

12 "The reason we challenge these
13 oppressions is simple, they
14 perpetuate hierarchies..."

15 And then it goes on.

16 Could you describe what is wrong with
17 hierarchies, in The SA's opinion?

18 A. Umm. Hierarchy... Doesn't mean
19 anything is wrong with... Sorry. Umm.

20 Hierarchies; they... One of the main
21 problems is that tools and resources are provided
22 specifically to a certain group of people as
23 opposed to other groups of people.

24 272 Q. Okay. And I guess, could you
25 explain why that's a bad thing?

1 A. Because then we don't have equity.

2 273 Q. Okay. Paragraph 6 of your
3 Affidavit, you indicate that The SA is an
4 equity-seeking body and it has four key areas of
5 supports including the Women's Centre, the Pride +
6 LGBTQ Centre, the Sexual Health Resource Centre
7 and the Campus Food Centre.

8 And these groups receive special -- or
9 these centres receive funding from The SA?

10 A. Yes.

11 274 Q. And they have employed staff?

12 A. Yes.

13 275 Q. Okay. Do you know how much
14 funding these groups receive?

15 R/F MS. SANCHE: I don't think that's
16 relevant.

17 MR. MOORE: Okay. So a refusal to
18 answer how much funding these groups receive?

19 MS. SANCHE: Yes.

20 MR. MOORE: Okay.

21 MS. SANCHE: It's not relevant.

22 BY MR. MOORE:

23 276 Q. So I see four key centres there.

24 Is there a reason why there's no

25 Outreach Services supports for First Nations, why

1 there isn't a First Nations centre?

2 R/F MS. SANCHE: I don't see how that's
3 relevant. There's any limitless number of
4 hypothetical alternative centres. It's not
5 relevant to this litigation, Counsel.

6 MR. MOORE: Well, we are talking about
7 societal oppression and hierarchies and I'm -- I've
8 heard the hierarchies are described as -- as
9 differentiations in tools and resources.

10 And I understand that these centres
11 receive special resources, so I'm trying to
12 understand The SA's description of itself as an
13 equity-seeking body and I think that is relevant to
14 this application.

15 MS. SANCHE: Are you implying that the
16 funding to these centres is related to the funding
17 to campus clubs?

18 MR. MOORE: I think The SA has made
19 funding a key issue of this application, and
20 indicating that funding is only going to
21 equity-seeking groups and marginalized groups.

22 And so I'm trying to understand The
23 SA's approach and elicit, for the benefit of the
24 Court, The SA's approach to its funding decisions.

25 MS. SANCHE: Well, this isn't about

1 funding. As you read this paragraph, it -- this is
2 an example of equity seeking. It doesn't talk
3 about funding.

4 So it says it "...supports..." - I
5 don't think that talks about funding; doesn't say
6 funds - "...four key areas, or centres..."

7 So I don't see the connection.

8 MR. MOORE: Okay. Well, maybe we'll
9 just -- we'll try and just move on then, not to
10 delve into it too deeply.

11 BY MR. MOORE:

12 277 Q. There's no First Nations support
13 centre specifically that The SA operates?

14 A. But we do have an Aboriginal
15 Student Circle.

16 278 Q. Okay. And that is another centre
17 that receives funding?

18 A. They are a group.

19 279 Q. A campus club?

20 A. A campus club.

21 280 Q. Okay. But there's no special --
22 you would agree with me that there's no particular
23 Outreach Service Centre for visible minorities, for
24 example?

25 A. For visible minorities?

1 281 Q. Correct. Specifically for visible
2 minorities?

3 A. For First Nations?

4 282 Q. No. I'm off of First Nations now.

5 A. Mm-hmm. So --

6 283 Q. There's no specific centre here--

7 A. So what would you categorize --

8 284 Q. --for visible minorities?

9 A. No.

10 285 Q. Okay.

11 A. They're listed here, as to the
12 centres at the Outreach--

13 286 Q. Right.

14 A. --Service.

15 ---(Court reporter appeals.)

16 THE WITNESS: They're listed here, the
17 centres at the Outreach Service.

18 BY MR. MOORE:

19 287 Q. Okay. And there's no specific
20 outreach centre for immigrant students?

21 A. No.

22 288 Q. Okay. Looking at Paragraph 7, you
23 note that this group "...appeared to
24 be...pro-life..."

25 When you used that statement,

1 "...appeared to be...pro-life..." what does that
2 mean? In Paragraph 7; do you see it there?

3 MS. SANCHE: The witness did not say
4 that this group is pro-life.

5 MR. MOORE: Okay.

6 MS. SANCHE: I suggest, Counsel, you
7 read the paragraph and don't take it out of
8 context.

9 BY MR. MOORE:

10 289 Q. Can we read the last sentence of
11 the paragraph here:

12 "Chantal flagged for us that
13 the group appeared to be a pro-life
14 group..."

15 So Chantal flagged this group as a
16 pro-life group.

17 What did that indicate to you in your
18 position as VP Equity; that this was a "pro-life
19 group"? What did that mean?

20 A. Well, as an Executive, Chantal...
21 Chantal flagged the group to the Executive Team;
22 therefore, she was seeking advice from the
23 Executive Team, and that's... That's what it
24 flagged, that --

25 290 Q. What did you understand "pro-life

1 group" to mean?

2 A. What did...?

3 MS. SANCHE: Sorry.

4 THE WITNESS: It's okay.

5 "Pro-life group", umm... A group
6 that...

7 MS. SANCHE: (Coughing.)

8 THE WITNESS: A group that... Sorry.

9 I -- are you okay?

10 MS. SANCHE: Mm-hmm. (Coughing.)

11 --- (Mr. Naggar refills Ms. Sanche's
12 glass of water.)

13 MS. SANCHE: Thank you.

14 THE WITNESS: A group that does not
15 have a mandate to embrace a woman's freedom of
16 reproductive choice.

17 BY MR. MOORE:

18 291 Q. Okay. There's a Supplemental
19 Affidavit that has been filed today, and one of the
20 exhibits to that Affidavit...

21 Does The SA have an in-house lawyer?

22 A. Yes.

23 292 Q. Okay. And does --

24 A. "In-house" -- sorry. Like, they
25 don't stay within The SA, but we do have a lawyer.

1 293 Q. Okay. In addition to your counsel
2 that's here today?

3 A. That's right.

4 294 Q. And do they help advise on the
5 policies and decisions of The SA?

6 A. Yes.

7 295 Q. Okay. Was The SA's in-house
8 lawyer involved in any of this, in the matters in
9 this situation?

10 R/F MS. SANCHE: Don't answer. It's
11 privileged.

12 MR. MOORE: Okay.

13 BY MR. MOORE:

14 296 Q. If The SA's lawyer attended a
15 meeting, would The SA's lawyer's attendance be
16 listed at that meeting?

17 U/A MS. SANCHE: Counsel, I'm going to
18 object because it's privileged. Let me take it
19 under advisement. I just don't want to open up a
20 door to questions that might be privileged, so...

21 MR. MOORE: Yeah.

22 MS. SANCHE: Just let me take it under
23 advisement, and if I think I can answer it...

24 So if the lawyer attends, would it be
25 noted in the minutes?

1 MR. MOORE: Yeah. Or -- yeah. There's
2 a bunch of different minutes of meeting.

3 MS. SANCHE: Okay. I'm taking it under
4 advisement. Go on.

5 MR. MOORE: Okay. Thanks.

6 BY MR. MOORE:

7 297 Q. At Paragraph 8 of your Affidavit,
8 you describe a meeting that occurred on August
9 24th. And this meeting is also referenced in the
10 Supplemental Affidavit filed today, and it makes
11 some minor changes.

12 But you mention that SF- -- or Speak
13 for the Weak's application was discussed at that
14 meeting.

15 Could you walk me through that meeting
16 and that discussion? I guess we have, at Exhibit
17 "A" of the Affidavit you filed today, we have a
18 list of the people who were there, but we have very
19 little information about what actually was said at
20 that meeting.

21 A. Mm-hmm.

22 298 Q. Do I understand correctly that you
23 attended that meeting?

24 A. Correct.

25 299 Q. And that Speak for the Weak's

1 application was discussed at that meeting?

2 A. Correct.

3 300 Q. Okay. Did you lead the discussion
4 of Speak for the Weak's application at that
5 meeting?

6 A. No.

7 301 Q. Do you know who did lead the
8 discussion?

9 A. Jesse Cullen, the President, he's
10 is the Chair of the Executive Committee meeting, so
11 he leads all meetings and all discussions; however,
12 the rest of the Executives, five present at the
13 time, as well as the business and the operation --
14 the General Manager contributed to the
15 conversation, as well.

16 302 Q. Okay. Do I understand it
17 correctly that The SA discussed its position
18 concerning abortion in relation to Speak for the
19 Weak's application at that meeting?

20 A. As stated here, we thoroughly
21 reviewed their application, the events for Speak
22 for the Weak, and we discussed the mandate of The
23 SA and the anti-oppressive principle.

24 303 Q. And did that discussion include a
25 discussion of how the anti-oppressive principle

1 applied in the context of Speak for the Weak's
2 proposed discussion and focus on the issue of
3 abortion?

4 A. It was discussed in regards to
5 that mandate, yes.

6 304 Q. Okay. So The SA had to determine
7 how its mandate applied specifically to a club that
8 wanted to discuss the issue of abortion; correct,
9 at this meeting?

10 A. It was discussed how, whether the
11 mandate of The Student Association is in line with
12 the mandate of the Speak for the Weak.

13 305 Q. Okay. And did you specifically
14 discuss the provision that we referenced earlier
15 about Speak for the Weak's advocating for the equal
16 value and protection of all human life from
17 fertilization to natural death?

18 A. As stated here, we discussed the
19 group description, we discussed the events, we
20 discussed their -- their category that was stated,
21 and the events in which they intended to
22 participate.

23 306 Q. And as we flagged earlier in
24 regards to the group description, the SA had no
25 problem with supporting students facing crisis and

1 no problem with raising fellow students' awareness
2 and understanding of life issues.

3 So was it discussed at this meeting,
4 particularly in regards to the group description,
5 the protection of all human life from fertilization
6 to natural death and whether that was in line with
7 The SA's mandate?

8 A. Was that discussed in particular
9 to anything else?

10 307 Q. Was that discussed?

11 A. Was that -- that -- the group
12 description was discussed, yes.

13 308 Q. That particular part of the group
14 description was discussed?

15 A. That part, as well, as well as the
16 other parts, as well.

17 309 Q. Okay.

18 A. Yeah.

19 310 Q. And was it, at this meeting,
20 decided that that particular part of the group
21 description did not comply with The SA's mandate?

22 A. I... We had -- we did conclude at
23 the meeting that we need to -- to consult with
24 other individuals, so nothing was decided at that
25 meeting.

1 What was decided, unfortunately with
2 two, four, six, seven people present, it can go for
3 a lengthy conversation, so, umm, but --

4 ---(Court reporter appeals.)

5 THE WITNESS: For -- with seven people
6 present, it can go for a lengthy conversation. But
7 yes, every aspect was decided, but nothing as to
8 the ratification of a club or not. It -- it wasn't
9 decided.

10 We did decide that we need to consult
11 with other individuals.

12 BY MR. MOORE:

13 311 Q. Okay. Did you decide what
14 conditions The SA was going to impose on the club
15 if it was going to grant the club, club status at
16 this meeting?

17 A. Can you repeat the question?
18 Sorry. I'm sorry.

19 MS. SANCHE: No. I'm just -- don't
20 answer that.

21 I don't think she said anything...
22 I don't know. If you can answer it,
23 answer it. I... Go ahead.

24 THE WITNESS: Can you repeat the
25 question?

1 BY MR. MOORE:

2 312 Q. Sure.

3 Did The SA decide on what conditions it
4 would require Speak for the Weak to fulfill in
5 order to grant Speak for the Weak's application for
6 club status at this August 24th meeting?

7 A. We solely discussed the
8 application that was at hand--

9 313 Q. Yes.

10 A. --as it was.

11 --- (Court reporter appeals.)

12 THE WITNESS: We solely discussed the
13 application that was at hand, as it was.

14 We did not discuss any hypothetical
15 situations.

16 BY MR. MOORE:

17 314 Q. Did you come to an agreement on
18 what conditions The SA would require Speak for the
19 Weak to meet if it was to receive club status?

20 R/F MS. SANCHE: That's not relevant.
21 There has been no allegations about conditions. I
22 don't understand this -- it's a -- it's a
23 hypothetical question again.

24 MR. MOORE: I'm not asking
25 hypothetically. I'm asking if it happened or if it

1 didn't happen.

2 MS. SANCHE: Well, we know what
3 happened.

4 You didn't ask, 'Did you determine that
5 there had to be conditions?'

6 You're saying, 'What conditions would
7 require to be ratified?'

8 I don't think there was any evidence
9 that that was ever an issue.

10 BY MR. MOORE:

11 315 Q. Okay. I'm going to direct your
12 attention to Paragraph 10.

13 Paragraph 10 states, the second
14 sentence:

15 "The SA decided that unless its
16 concerns about the following were
17 addressed, it would not accept the
18 ratification of Speak for the Weak."

19 [As read.]

20 Did I read that correctly?

21 A. That's right. That's right.

22 316 Q. Okay. And the SA decided this at
23 the August 24th meeting?

24 A. No. It states, "Between this
25 meeting and September 3[rd]..."

1 317 Q. Okay. So these -- this was not
2 decided at the August 24th meeting?

3 MS. SANCHE: She already answered that
4 question, Counsel, and--

5 MR. MOORE: I'm trying to --

6 MS. SANCHE: --it's stated in the
7 Affidavit.

8 MR. MOORE: I'm trying to gain an
9 understanding. I'm sorry, Counsel.

10 R/F MS. SANCHE: You're repeating yourself
11 ad nauseam. I have to object.

12 And I would also like to point out that
13 there's nothing in that paragraph that says
14 anything about conditions.

15 If you want to ask her if there were
16 conditions, then that's fine.

17 But these questions are not proper, in
18 my respectful opinion.

19 BY MR. MOORE:

20 318 Q. Can I ask you a question about
21 Paragraph 10 here?

22 "The SA decided that unless its
23 concerns about the following were
24 addressed, it would not accept the
25 ratification of Speak for the Weak."

1 [As read.]

2 Do I understand correctly that if Speak
3 for the Weak addressed these four concerns listed,
4 it would have potentially been ratified by The SA?

5 A. Well, that would be a different
6 situation.

7 As spoken previously about
8 re-ratification, students can reapply and then we
9 would take it by a case basis.

10 However, we did flag that these were
11 the main problems with the application. And we
12 would do a due diligence, that if they were to be
13 addressed, we would do a due diligence to meet with
14 the individuals again.

15 319 Q. Okay.

16 A. Okay.

17 320 Q. So if these concerns were
18 addressed, the application would have at least
19 moved forward?

20 MS. SANCHE: I... Sorry.

21 MR. MOORE: I'm trying to understand
22 the answer, Counsel.

23 BY MR. MOORE:

24 321 Q. Is that correct; that if these
25 four concerns - or I guess I understand them as

1 conditions, but you understand them as concerns -
2 were addressed, then the application of Speak for
3 the Weak for club status could have moved forward
4 and the SA would have continued to do due
5 diligence?

6 A. We would have continued to do due
7 diligence as we had done from the beginning.

8 322 Q. Was there any possibility, in The
9 SA's understanding, whether Speak for the Weak
10 could meet these conditions or these concerns?

11 A. Was there any what?

12 323 Q. Was there any...? Did The SA
13 believe that there's a possibility that Speak for
14 the Weak could meet these concerns?

15 A. I can't speak for -- for Speak for
16 the Weak.

17 324 Q. In your understanding, in your
18 position in that Executive Committee, did you think
19 that it was possible for Speak for the Weak to meet
20 these concerns, to address these concerns?

21 A. That's not within my, my
22 qualifications or -- "qualifications" -- that's not
23 within my description.

24 I wasn't there at the October 6th
25 meeting. I did not hear the discussion; however,

1 we did say that we would do our due diligence if
2 these concerns were to be addressed.

3 325 Q. So if Speak for the Weak addressed
4 these concerns, the SA would have done further due
5 diligence; correct?

6 A. Yes.

7 326 Q. Okay. Paragraph 9 of your
8 Affidavit mentions, "...Outreach Services
9 Manager,..."

10 A. Darshika.

11 327 Q. "...Darshika Selvasivam..."?

12 A. Darshika.

13 328 Q. Darshika Selvasivam.

14 A. Mm-hmm.

15 329 Q. Sorry about my pronunciation.
16 And she was consulted after the August
17 24th meeting; correct?

18 A. That's right.

19 330 Q. And she was an employee of The SA?

20 A. That's right.

21 331 Q. Is she still affiliated or there
22 at UOIT or Durham College--

23 A. No.

24 332 Q. --in any -- no capacity.
25 If she had records about this

1 application for Speak for the Weak, would those
2 records still be in the control of The SA; any
3 documents?

4 A. If she had records, yes.

5 333 Q. Okay.

6 The SA also met with the Diversity
7 Office at Durham College?

8 A. Correct.

9 334 Q. Do you know which members of The
10 SA met with the Equity (sic) Office?

11 A. It was on an ad hoc basis. I know
12 Jesse met; however, for the rest of the Executives,
13 I don't know.

14 335 Q. Okay. Was the August 24th meeting
15 an ad hoc meeting?

16 A. No.

17 336 Q. Okay. It was a regular Board--

18 A. Monday--

19 337 Q. --meeting?

20 A. --meeting. Sorry.

21 338 Q. Okay.

22 --- (Court reporter appeals.)

23 THE WITNESS: A regular meeting.

24 BY MR. MOORE:

25 339 Q. In regards to the meeting with the

1 Diversity Office at Durham College, do you know
2 what was said at that meeting?

3 A. I don't know.

4 340 Q. Do you know what the position of
5 Durham College was concerning the application of
6 Speak for the Weak?

7 MS. SANCHE: Sorry.

8 Were you there at the meeting?

9 THE WITNESS: No. No.

10 MS. SANCHE: Okay.

11 BY MR. MOORE:

12 341 Q. Did you become aware of the
13 position of the Diversity Office of Durham College
14 in regards to Speak for the Weak's application?

15 A. Did I -- sorry. Did I become
16 what?

17 342 Q. Did you become aware of what
18 position Durham College represented to at least
19 Jesse and perhaps other members of the Executive in
20 -- concerning Speak for the Weak's application?

21 A. Yes. Jesse did let me know that
22 Durham College and UOIT respected our autonomy, and
23 they... Yeah. They decided that they would
24 respect our autonomy as to how we would move
25 forward with this decision.

1 343 Q. Did they give any recommendations;
2 do you know?

3 R/F MS. SANCHE: She wasn't at the meeting.
4 Counsel.

5 BY MR. MOORE:

6 344 Q. Did you become aware if UOIT or
7 Durham College representatives gave any
8 recommendations for The Student Association to move
9 forward with this application?

10 R/F MS. SANCHE: You're asking her to give
11 you hearsay evidence?

12 BY MR. MOORE:

13 345 Q. In your position within the
14 Executive, did you become aware of any
15 recommendations from Durham College--

16 A. No.

17 346 Q. --or UOIT concerning the
18 application?

19 A. No. Their... Their mandate is
20 not to give us recommendation, but they did say
21 that they respect our autonomy.

22 347 Q. I'm confused as to which Affidavit
23 was sworn today. Okay.

24 Exhibit "A" of your Affidavit sworn
25 today, at the very end of it, it says underneath

1 the Club's proposals:

2 "The institutions have a Risk
3 Manager that must approve clubs, as
4 well." [As read.]

5 Do you know who that Risk Manager or
6 Risk Managers are?

7 A. I believe, because Durham College
8 and UOIT have different ones, there's Elaine
9 Wannamaker and someone else. Unfortunately, I
10 don't remember the name.

11 But just to let you know, because we
12 were discussing two different clubs at this meeting
13 - Pro-Life and the Gun Club - the reason why this
14 last sentence was in there was because we needed to
15 talk to the Risk Manager in regards to the Firearm
16 Association, previously known as the Gun Club.

17 348 Q. Okay. So no approval of the Risk
18 Manager was needed in regards to Speak for the
19 Weak?

20 A. No.

21 349 Q. And none was sought, I would
22 assume, either?

23 A. No.

24 MR. MOORE: Do we need to have a short
25 break or how are we doing?

1 MS. SANCHE: Off the record.

2 --- (Discussion off the record.)

3 --- Recess at 3:45 p.m.

4 --- On resuming at 3:50 p.m.

5 BY MR. MOORE:

6 350 Q. A club that has been denied its
7 application for club status can reapply another
8 year for club status; correct?

9 A. Yes.

10 351 Q. So if Speak for the Weak wanted
11 to, they could apply next year and attempt to go
12 get club status again?

13 A. They can attempt -- apply within
14 the same year, as well.

15 352 Q. Okay. Has The SA taken any steps
16 to solidify its support for women as a marginalized
17 group or equity-seeking group?

18 A. We have written a Feminist
19 Framework Policy and it is in the process. Because
20 of the election period, we didn't have the
21 opportunity to present it to the Board.

22 The Board needs to accept that policy,
23 but it has been written and we are in the process
24 of -- of presenting it to the Board, as well as
25 other activities throughout the year that we have

1 done, as well, such as on November 25th, there was
2 the International Day of Elimination of Violence
3 Against Women.

4 We held a workshop with UOIT and Durham
5 College to discuss violence against women because,
6 as we know, it's disproportionately higher than
7 other constituencies.

8 So whether it's through events, policy,
9 we are taking a step forward, yes.

10 353 Q. Okay. And if this policy that --
11 I guess, would The SA have drafted this new policy,
12 this feminist policy?

13 A. Yes.

14 354 Q. Okay. I am assuming you were
15 involved, in your position, in drafting that
16 policy?

17 A. The -- I was -- it was mainly the
18 Student Rights and Advocacy Coordinator that would
19 -- but I was -- I was there, as well. I was
20 involved.

21 355 Q. And all members of the Executive
22 are given -- have input into the policy that's--

23 A. Yes.

24 356 Q. --drafted?

25 A. Yes.

1 357 Q. And then that policy was submitted
2 to the Board or, like --

3 A. It is in the process of being
4 submitted.

5 We had about six policy -- five or six
6 policies -- I'm sorry. Don't -- we had a numerous
7 number of policies that we wanted to present to the
8 Board. Unfortunately, we are taking them case by
9 case -- "unfortunately".

10 We are taking them case-by-case basis
11 and we only had one of them ratified at the moment,
12 and then tabled the next to the next meeting.

13 358 Q. Okay. What was the ratified
14 policy?

15 A. The anti-racism policy.

16 359 Q. Okay. So the policies have been
17 split up and the feminist policy has not been
18 submitted to the Board for ratification yet?

19 A. Just yet; that's correct.

20 360 Q. Would that feminist policy apply
21 to Speak for the Weak's future application if they
22 chose to make one next year, for next school year
23 for--

24 A. It --

25 361 Q. --club status?

1 A. It depends on their application.

2 362 Q. If Speak for the Weak, under their
3 current mandate, chose to apply for club status
4 next year, would that policy apply to them?

5 A. Yes.

6 363 Q. Okay. Would that policy prohibit
7 them from being a club?

8 A. As well as the mandate of The
9 Student Association because it wouldn't change next
10 year, but yes, it would.

11 364 Q. Okay.

12 --- (Court reporter appeals.)

13 THE WITNESS: Because it -- it will not
14 change next year, yes, it would.

15 BY MR. MOORE:

16 365 Q. So if this -- just to get it clear
17 for me, just -- if this policy is adopted, it would
18 prohibit Speak for the Weak from being a campus
19 club?

20 A. It would not be the direct reason,
21 though.

22 366 Q. Along with the other reasons?

23 A. The reason -- any policy that is
24 implemented, it is to strengthen the mandate of The
25 Student Association. As such, that is why we are

1 bringing forward a Feminist Framework Policy.

2 If Speak for the Weak were to their --
3 their application forward as-is next year, it would
4 be denied because they -- because of the reasons
5 that we have listed in this application.

6 367 Q. Okay. Have additional changes
7 been made to the Feminist Framework Policy since it
8 was publicized?

9 A. It hasn't been publicized. I
10 don't understand. Sorry.

11 368 Q. Okay. My understanding is that
12 the Feminist Framework Policy has been put out on
13 an agenda of Speak for the Weak (sic).

14 A. No.

15 MS. SANCHE: You didn't mean "Speak for
16 the Weak", did you?

17 BY MR. MOORE:

18 369 Q. On an agenda of The SA?

19 MR. MOORE: No. Thank you, Counsel.

20 THE WITNESS: They have been put on an
21 agenda at the Board meeting; correct. Sorry. I
22 thought you meant Speak for the Weak.

23 BY MR. MOORE:

24 370 Q. No. My --

25 A. They have been put in an agenda.

1 Has it been changed ever since the
2 point that it was presented? No.

3 371 Q. Okay. So if I showed you a policy
4 on the agenda for January 15th, 2016, entitled the
5 "Feminist Framework Policy", that is the policy
6 that we have just been discussing?

7 A. Correct.

8 MR. MOORE: I would like mark this
9 policy as an exhibit to the questioning, then. And
10 this includes the agenda and 14 pages; the agenda
11 as well as Appendix "A". So I will provide you
12 with that.

13 MS. SANCHE: You'll copy it, right?

14 MR. MOORE: Yeah. I'll copy it.

15 MS. SANCHE: Or Madam Reporter will.
16 What exhibit is it; "A"?

17 MR. MOORE: "A", so far. I haven't...

18 MS. SANCHE: I don't like these
19 stickers. Where's the stamp? It doesn't have the
20 whole thing.

21 ---(Ms. Sanche marks Exhibit "A".)

22 THE WITNESS: Just to make sure, this
23 has not been ratified by the Board.

24 BY MR. MOORE:

25 372 Q. Yeah, I understand. Yeah. Your

1 testimony stands.

2 A. Okay.

3 MS. SANCHE: Is that okay?

4 THE COURT REPORTER: Yes.

5 ---EXHIBIT NO. A: SA Agenda, dated
6 January 15, 2016, with Appendix "A", totalling
7 seven double-sided pages.

8 MS. SANCHE: Do you want to give me the
9 other one or you -- no. You've marked it up. I'll
10 read that one. I just don't want to...

11 MR. MOORE: I actually don't have any
12 further questions on it.

13 MS. SANCHE: Well, we'll get copies of
14 it.

15 MR. MOORE: You can keep it.

16 BY MR. MOORE:

17 373 Q. Looking at Paragraph 11 of the
18 your Affidavit, you state that:

19 "The SA Executive does not aim
20 to ban students from organizing or
21 censor students; it solely
22 prioritizes the funds toward
23 marginalized groups."

24 A. (Nodding head.)

25 374 Q. Are you referring in that

1 paragraph to the funding of campus clubs?

2 A. Correct.

3 375 Q. Okay. Is the UOIT/DC Pre-Medical
4 Association a marginalized group?

5 A. No.

6 376 Q. Is the Student Law Association a
7 marginalized group?

8 A. No.

9 377 Q. Is the UOIT Pre-Dental Community a
10 marginalized group?

11 A. No.

12 378 Q. Is the Ridgeback Rides (UOIT/DC
13 Car Club) a marginalized group?

14 A. No.

15 379 Q. Is the Arcade and Fighting Games
16 Club a marginalized group?

17 A. No.

18 380 Q. Is the Lanwar X a marginalized
19 group?

20 A. No.

21 381 Q. Is the Laser Tag Club a
22 marginalized group?

23 A. No.

24 382 Q. Is the UOIT/DC Firearms
25 Association a marginalized group?

1 A. No.

2 383 Q. Is the UOIT/DC Sports Business
3 Association a marginalized group?

4 A. No.

5 384 Q. Is the Hellenic Students'
6 Association a marginalized group?

7 A. I'm not entirely sure as to what
8 they are, so don't --

9 385 Q. Okay.

10 A. I -- I can't say.

11 386 Q. They are Greek --

12 A. I don't know.

13 387 Q. I would assume they are Greek
14 students.

15 A. Okay.

16 388 Q. But to your knowledge, do you know
17 if they're a marginalized group?

18 A. I can't speak. I don't know who
19 they are, so...

20 389 Q. Is the Saudi Students' Association
21 a marginalized group?

22 A. The Saudi Student Association?
23 I... They... They would be an equity-seeking
24 group.

25 --- (Court reporter appeals.)

1 THE WITNESS: Sorry. They would be --
2 they would be identified as a racialized
3 constituency and therefore an equity-seeking group.

4 BY MR. MOORE:

5 390 Q. Okay. Would the Hindu Youth of
6 Today also be an equity-seeking group?

7 A. They are a racialized
8 constituency, as well, so yes.

9 391 Q. Okay. So other than the Saudi
10 and the Hindu student groups that I mentioned, do
11 all those other groups also receive funding from
12 The SA?

13 A. Yes.

14 392 Q. If they're not a marginalized
15 group, why do they receive funding from The SA?

16 A. Because, in their application
17 process, as -- as it was presented, they abide by
18 the... They seek to represent what the Student
19 Association stands, which...

20 Sorry. Let me go back. It's been a
21 long day.

22 ...to organize students on a democratic
23 cooperative basis for advancement of students'
24 interests and advancing the interests of students
25 (sic).

1 This gives students the opportunity for
2 them to -- to communicate, organize and exchange
3 information, share experience, skills and ideas.

4 393 Q. Okay. And just to clarify, you
5 are reading--

6 A. The --

7 394 Q. --primarily from Paragraph 4 of
8 your Affidavit, but actually from the Statement of
9 Principles which is included in the bylaws of The
10 SA at sub (b)?

11 A. That's right.

12 395 Q. Okay. And... But Speak for the
13 Weak is not within that common framework that you
14 just read from; correct?

15 A. They -- they do not apply to that
16 mandate due to the four reasons that was -- were
17 stated where; Paragraph 10.

18 396 Q. Okay. So therefore, they do not
19 fulfill paragraphs (a) and (b) of the Statement of
20 Principles of The SA? They do not engage in those
21 opportunities?

22 A. Not those two.

23 It was the four reasons that were
24 stated in -- in Paragraph 10.

25 397 Q. Correct. And those are the

1 reasons why they were denied club status?

2 A. Correct.

3 398 Q. But since they're not recognized
4 clubs like the other ones we just -- we just
5 discussed, then they don't, under The SA, fulfill
6 paragraphs (a) and (b) in their activities?

7 A. No. Again, they don't, umm...
8 They do not adhere to the mandate of The Student
9 Association.

10 It's as if we are playing word games
11 here.

12 They do not adhere to the mandate of
13 The Student Association as listed in Paragraph 10.

14 399 Q. Okay.

15 A. Okay.

16 400 Q. I'm not meaning to be in any word
17 games, I will assure you. But you referenced that
18 these other clubs that are receiving funding--

19 A. Mm-hmm.

20 401 Q. --are receiving funding because
21 that is part of The SA's goal, to - and I'm quoting
22 these paragraphs (a)--

23 A. Mm-hmm.

24 402 Q. --and (b). Part of The SA's goal
25 is:

1 "To organize students on a
2 democratic, cooperative basis for
3 advancing students' interests and
4 advancing the interests of the
5 students' community."

6 And:

7 "(b) to provide a common
8 framework within which students can
9 communicate, exchange information
10 and share experience, skills and
11 ideas."

12 A. Right. And then the rest, up to
13 point (h), they do not --

14 403 Q. Sorry. Can I finish my question?

15 A. I apologize.

16 404 Q. Yeah.

17 So in regards to those two paragraphs,
18 that's The SA's mandate to comply -- to, to
19 organize,--

20 A. Mm-hmm.

21 405 Q. --under Paragraph (a), organize
22 students--

23 A. Mm-hmm.

24 406 Q. --and then, under Paragraph (b),
25 to provide this common framework?

1 A. Mm-hmm.

2 407 Q. And that is provided to the group
3 of clubs that we discussed previously correct?

4 A. Mm-hmm.

5 408 Q. But that --

6 --- (Court reporter appeals.)

7 THE WITNESS: Yes. Yes. I'm sorry.

8 BY MR. MOORE:

9 409 Q. But that provision of organizing
10 students for advancing students' interests and
11 providing a common framework is not provided to
12 Speak for the Weak; correct?

13 A. To -- the -- there are eight
14 mandates here, I believe, for --

15 410 Q. I'm just talking about these first
16 two provisions. Is Speak for the Weak assisted by
17 The SA's mandate to organize students on a
18 democratic, cooperative basis for advancing
19 students' interests? Does The SA assist Speak for
20 the Weak in that manner?

21 A. Do we assist them?

22 411 Q. Right.

23 A. They are not ratified, so--

24 412 Q. All right. So--

25 A. --we cannot assist them.

1 413 Q. --you don't assist them?

2 A. They are not -- they are not a
3 club; therefore, we do not assist them.

4 414 Q. Okay. And does The SA assist
5 Speak for the Weak by providing a common framework
6 within which those students within Speak for the
7 Weak can communicate and exchange information?

8 A. They're not ratified again, so we
9 do not assist them.

10 415 Q. Okay.

11 A. However, that does not mean that
12 they -- sorry. Go ahead.

13 416 Q. (Gesturing.)

14 A. Yeah. That does not mean that
15 this group does not have the ability to organize on
16 a democratic, cooperative basis, as well as provide
17 a common framework within the campus community.

18 So to my statement, we do not aim to
19 ban students from organizing or censor, it still
20 stand -- I still stand.

21 MR. MOORE: All right. Well, thank you
22 for your questions -- or answers. Pardon me.

23 I think I will take about a five-minute
24 break and then just review.

25 ---Recess at 4:06 p.m.

1 ---On resuming at 4:18 p.m.

2 MR. MOORE: So no further questions
3 today, pursuant -- subject to undertakings and, I
4 guess, along with Counsel, there's a decision
5 coming out relative to these issues. I am not
6 going to close today. I don't anticipate any
7 further questions, but I anticipate that this will
8 be mutual; the possibility of going back, unlikely.

9 MS. SANCHE: Well, I didn't provide for
10 that on my Examination and I don't think we have
11 discussed it, but I think if you and I can come to
12 an agreement--

13 MR. MOORE: Okay.

14 MS. SANCHE: --on whether or not we
15 will revisit anything, which--

16 MR. MOORE: So subject --

17 MS. SANCHE: --I think we will, but --

18 MR. MOORE: Subject to those
19 discussions,--

20 MS. SANCHE: Yeah. Fair enough.

21 MR. MOORE: --the questioning is done
22 for today.

23 MS. SANCHE: Great.

24 MR. MOORE: Off the record.

25 ---[Ending time: 4:19 p.m.]

REPORTER'S CERTIFICATE

I, BONNIE LYNN VAN DER MEER, C.S.R.,
Chartered Shorthand Reporter, hereby certify;

That the foregoing proceedings were
taken before me at the time and place therein set
forth, at which time the witness was put under
solemn affirmation by me;

That the testimony of the witness and
all objections made at the time of examination were
recorded stenographically by me and were thereafter
transcribed by me;

That the foregoing is a true and
correct transcript of my shorthand notes so taken.

Dated this 31st day of March, 2016.



BONNIE LYNN VAN DER MEER, CSR
NEESON COURT REPORTING INC.

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