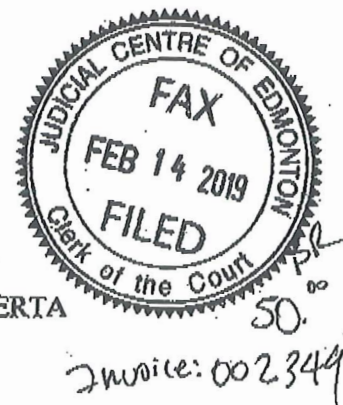


Clerk's stamp:



**COURT FILE NUMBER** 1903 01625

**COURT** COURT OF QUEEN'S BENCH OF ALBERTA

**JUDICIAL CENTRE** EDMONTON

**APPLICANT** REBEL NEWS NETWORK LTD.  
 (Respondent on Intervener Application)

**RESPONDENT** THE ELECTION COMMISSIONER OF ALBERTA  
 (Respondent on Intervener Application)

**DOCUMENT** APPLICATION TO INTERVENE

**PARTY FILING THIS DOCUMENT** JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS  
 (Applicant on Intervener Application)

**ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT**

Attention: Rod Wiltshire  
 Justice Centre for Constitutional Freedoms  
 #253, 7620 Elbow Drive SW  
 Calgary, Alberta T2V 1K2  
 Phone: 587-590-6902  
 Fax: 587-352-3233  
 Email: rwiltshire@jccf.ca

and

**CONTACT INFORMATION OF ALL OTHER PARTIES:**

Attention: Michael E. Swanberg  
 Reynolds Mirth Richards & Farmer  
 LLP 3200 Manulife Place  
 10180 - 101 Street  
 Edmonton, AB T5J 3W8  
 Phone: (780) 425-9510  
 Fax: (780) 429-3044  
 Counsel for the Rebel News Network Ltd.

## **NOTICE TO THE RESPONDENT**

This application is made against you. You are a respondent.

You have the right to state your side of this matter before the Court.

To do so, you must be in Court when the application is heard as shown below:

Date:	March 15, 2019
Time:	10:00
Where:	Law Courts Building, Edmonton, Alberta
Before:	Justice in Chambers

Go to the end of this document to see what you can do and when you must do it.

### **Remedy Sought**

1. The Applicant, the Justice Centre for Constitutional Freedoms (the “Justice Centre”), seeks an Order pursuant to Rule 2.10 of the *Alberta Rules of Court*:
  - a) granting the Justice Centre leave to intervene in the above matter on such terms and conditions as this Honourable Court deems just and appropriate;
  - b) to file a factum not exceeding 20 pages and to make oral submissions as directed by the Court; and
  - c) directing that the Justice Centre bear its own costs and that no costs shall be awarded against it.

### **Grounds for Making this Application**

2. This Application to Intervene is made on the grounds that the Justice Centre will be able to assist the Court in possessing the fullest perspective from which to rule on the above matter by providing the Court with useful and different submissions from the perspective of a non-party who has special expertise on a subject matter central to this case, freedom of expression.

**Materials to be Relied on**

3. The Affidavit of John Carpay, sworn on February 13, 2019;
4. Brief of Argument in Support of Application to Intervene; and
5. Such further and other material as counsel may advise and as this Honourable Court may permit.

**Applicable Acts and Rules**

6. *Alberta Rules of Court*, Alta Reg 124/2010, including Rules 1.2-1.4, 2.10, 6.2, and 6.3 and such other Rules as may be applicable;
7. *Canadian Charter of Rights and Freedoms*, Part I of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982 (UK)*, 1982, c 11;
8. *Alberta Bill of Rights*, RSA 2000, c A-14; and
9. *Election Finances and Contributions Disclosure Act*, RSA 2000, c E-2

**WARNING**

You are named as a respondent because you have made or are expected to make an adverse claim in respect of this originating application. If you do not come to Court either in person or by your lawyer, the Court may make an order declaring you and all persons claiming under you to be barred from taking any further proceedings against the applicant(s) and against all persons claiming under the applicant(s). You will be bound by any order the Court makes, or another order might be given or other proceedings taken which the applicant(s) is/are entitled to make without any further notice to you. If you want to take part in the application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of this form. If you intend to rely on an affidavit or other evidence when the originating application is heard or considered, you must reply by giving reasonable notice of that material to the applicant(s).