

FILED IN THE OFFICE OF THE  
LOCAL REGISTRAR ON THE  
5<sup>th</sup> DAY OF Sept 2023

*A. Pickering*  
Deputy Local Registrar  
Judicial Centre of Regina

COURT FILE NUMBER KBG-RG-01978-2023

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE REGINA

APPLICANTS PARENTS FOR CHOICE IN EDUCATION AND GENDER  
DYSPHORIA ALLIANCE

RESPONDANT (APPLICANT) UR PRIDE CENTRE FOR SEXUALITY AND GENDER  
DIVERSITY

RESPONDANTS (RESPONDANTS) GOVERNMENT OF SASKATCHEWAN AS REPRESENTED  
BY THE MINISTER OF EDUCATION, CONSEIL DES  
ECOLES FRANSASKOISES, CHINOOK SCHOOL  
DIVISION, CHRIST THE TEACHER CATHOLIC SCHOOL,  
CREIGHTON SCHOOL DIVISION NO. 111, GOOD SPIRIT  
SCHOOL DIVISION, GREATER SASKATOON CATHOLIC  
SCHOOLS, HOLY FAMILY ROMAN CATHOLICS  
SEPARATE SCHOOL DIVISION #140, HOLY TRINITY  
CATHOLIC SCHOOLS, HORIZON SCHOOL DIVISION, ILE-  
A-LA CROSSE SCHOOL DIVISION NO. 112, LIGHT OF  
CHRIST CATHOLIC SCHOOLS, LIVING SKY SCHOOL  
DIVISION NO. 202, LLOYDMINSTER CATHOLIC SCHOOL  
DIVISION, LLOYDMINSTER PUBLIC SCHOOL DIVISION,  
NORTH EAST SCHOOL DIVISION, NORTHERN LIGHTS  
SCHOOL DIVISION NO. 113, NORTHWEST SCHOOL  
DIVISION #203, PRAIRIE SOUTH SCHOOL DIVISION,  
PRAIRIE SPIRIT SCHOOL DIVISION, PRAIRIE VALLEY  
SCHOOL DIVISION, PRINCE ALBERT CATHOLIC  
SCHOOL DIVISION, REGINA CATHOLIC SCHOOLS,  
REGINA PUBLIC SCHOOLS, SASKATCHEWAN RIVERS  
SCHOOL DIVISION, SASKATOON PUBLIC SCHOOL,  
SOUTH EAST CORNERSTONE PUBLIC SCHOOL  
DIVISION #209, AND SUN WEST SCHOOL DIVISION

#### NOTICE OF JOINT APPLICATION FOR LEAVE TO INTERVENE

#### NOTICE TO RESPONDENT(S)

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:

Where: Court of King's Bench  
425 Victoria Avenue Regina, SK

Date: TBD by direction of the Court

Time: TBD by direction of the Court

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

**Remedy claimed or sought:**

1. An Order pursuant to Rule 2-12 granting Gender Dysphoria Alliance and Parents for Choice in Education (the “Joint Interveners”) leave to intervene at the hearing of the Notice of Application – Interim and Interlocutory Injunction, with leave to file a written brief of law no more than 10 pages, submit affidavit evidence and give oral submissions of not more than 15 minutes.
2. An Order pursuant to Rule 2-12 granting the joint interveners leave to intervene in the Originating Application, with leave to file a written brief of no more than 20 pages, submit affidavit evidence and give oral submissions of not more than 30 minutes.
3. An Order directing that the Joint Interveners will bear their own costs and that no costs shall be awarded against them.
4. In the alternative, if this Court deems one of the Joint Interveners unsuitable, an Order granting the remaining Joint Intervener leave to intervene in this proceeding as requested above.
5. Such further and other relief as counsel may advise and this Honourable Court may deem just.

**Grounds for making this application:**

6. The Joint Interveners have a direct and significant interest in the matters raised by this proceeding, as well as the expertise required to meaningfully assist the Court.

*Gender Dysphoria Alliance*

7. Gender Dysphoria Alliance (“GDA”) was formed in 2021 by two Canadian transmen motivated to correct the narrative about gender dysphoria with concern about errant information in the healthcare and education systems that can negatively impact women, children and the LGB community. Led by Executive Director, Aaron Kimberly, a Canadian mental health clinician with experience providing care to transgender and gender questioning patients, GDA produces evidence based educational resources about gender dysphoria, seeks to support its members and others experiencing gender dysphoria, produces a regular podcast, publishes articles and stories from members of the gender dysphoria community, networks with similar groups and individuals around the world, attends and participates in conferences related to gender dysphoria and advocates for appropriate laws and medical standards regarding gender dysphoria. GDA is not formally affiliated with any political party, religious organization or professional association.

Parents for Choice in Education

8. Parents for Choice in Education (“PCE”) is a non-sectarian, not-for-profit advocacy organization dedicated to informing, equipping, and mobilizing citizens toward an excellent, quality-oriented, choice-driven education system which recognizes parental authority. It has been active for almost 11 years and has provided extensive resources for thousands of parents and families to advocate for their children in the school system. It has published dozens of columns in print and online media, in addition to talks and workshops on democratic involvement in school boards. It supports the capacity of parents and advocates for schools to be responsive to the actual needs of students. It has also supported policies that affirm a school's ability to ensure that all activities, resources and curricula are cohesive with the missions of public and private schools, on which missions parents choose public or private education to educate their children. PCE opposed Alberta laws and policies that prevented the notification of parents about school clubs and activities their children were involved in, leading to PCE's participation in a legal case focusing on parental rights and protecting children.

Proposed Intervention

9. If granted leave, the Joint Interveners seek to present submissions, from their unique perspective and experience, on the following points:
- a. Canadian law recognizes parents as the primary decision makers of their children for all significant decisions, including being charged with the responsibility of the education and moral upbringing of their children.
  - b. A parents' right to exercise decision making authority regarding their children involves being informed and involved in important decisions or any significant developments in their children's social behaviour at school, absent demonstrable necessity of risk of harm on a case-by-case basis.
  - c. Some children have a heightened risk to experience distress about their gender identity because of their development, unique personal circumstances or vulnerabilities.
  - d. Adults and peers in school systems can have a significant influence on children's self-perception, including about their gender identity.
  - e. The best interests of children, including their legal and constitutional rights, are protected by the informed involvement of their own parents.
10. The Joint Interveners' participation will not prejudice any of the other parties. Their participation will not delay the hearing of the injunction or the hearing on the merits, and they will adhere to the schedule agreed upon by the parties and this Court.

11. The Joint Interveners will not seek to expand the issues beyond those raised by the original parties.
12. The Joint Interveners will endeavour to do nothing that would unduly delay the hearing or prejudice the existing parties.

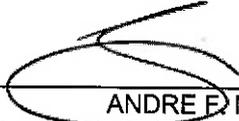
**Material or evidence to be relied on:**

13. The Affidavit of Aaron Kimberly, to be filed.
14. The Affidavit of John Hilton-O'Brien, to be filed.

**Applicable rules:**

15. *The Queen's Bench Rules*, Rules 2-12 and 6-1.

DATED at Saskatoon, Saskatchewan, this 5<sup>th</sup> day of September, 2023.

  
ANDRE F. MEMAURI,  
Counsel for the Joint Interveners

**NOTICE**

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the

**This document delivered by:**

**Name of firm:** Charter Advocates Canada

**Name of lawyer in charge of file:** Andre F. Memauri

**Address of firm**

[REDACTED]

**Telephone:**

[REDACTED]

**Email:**

[REDACTED]