

COURT OF APPEAL OF ALBERTA

Form AP-3
[Rule 14.53]

COURT OF APPEAL FILE NUMBER: 2501-0282AC
TRIAL COURT FILE NUMBER: 2301-14224
REGISTRY OFFICE: CALGARY
APPLICANT: YUE SONG
STATUS ON APPEAL: APPELLANT
STATUS ON APPLICATION: APPLICANT
RESPONDENT: THE LAW SOCIETY OF ALBERTA
STATUS ON APPEAL: RESPONDENT
STATUS ON APPLICATION: RESPONDENT
DOCUMENT: **APPLICATION OF YUE SONG, APPELLANT**



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

Glenn Blackett
Glenn Blackett Law
[Redacted]

and

CONTACT INFORMATION OF ALL OTHER PARTIES:

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[Redacted]

NOTICE TO RESPONDENT(S): THE LAW SOCIETY OF ALBERTA,
RESPONDENT

WARNING

If you do not come to Court on the date and time shown below either in person or by your lawyer, the Court may give the applicant what it wants in your absence. You will be bound by any order that the Court makes. If you intend to rely on other evidence or a memorandum in support of your position when the application is heard or considered, you must file and serve those documents in compliance with the Rules. (Rule 14.41 and 14.43)

NOTICE TO 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: To be arranged by the Registrar.
Time: To be arranged by the Registrar.
Where: Alberta Court of Appeal, Calgary, Alberta
Before: A Single Judge of the Alberta Court of Appeal (Rule 14.37)

Nature of Application and Relief Sought:

1. Amendment to a March 9, 2026, order of the case management officer to permit the filing of lower Court briefs in the appeal record or extracts of key evidence.

Grounds for making this application:

2. As acknowledged by the lower Court and due to short oral submissions, the applicant placed heavy reliance on the assumption that the Court would read and engage with the applicant's written arguments. Broadly speaking, the Court did not. The reasons fail to address key arguments and seriously misconstrue others. The case put to the lower Court is, therefore, in key respects substantially absent from the record before this Court.
3. The lower Court briefs are required to afford the appellant a meaningful appeal: to prove what was argued and not addressed or misconstrued; to prove such omissions and misconstructions affected the outcome; and to provide essential factual and legal context.

4. Facts are not for the purpose of restating the case put to the lower Court, but for the purpose of discussing lower Court errors.

Material or evidence to be relied on:

5. Affidavit of Yue (Roger) Song in Support of Application, sworn June 4, 2026.
6. Pursuant to Rule 14.28 the applicant intends to rely on the following affidavits which have not been filed but are part of the record:
 - a. Expert Report of Joanna Williams, filed October 27, 2023
 - b. Affidavit of Yue (Roger) Song, filed December 21, 2023;
 - c. Affidavit of Yue (Roger) Song, filed March 18, 2025; and
 - d. Affidavit of Yue (Roger) Song, filed April 4, 2025.
7. Such further and other evidence as counsel shall advise.

Applicable Acts, regulations and rules:

1. S. 14(2)(c)(ii) of the *Court of Appeal Act*, RSA 2000 c. C-30.
2. *Rules* 1.2(1), 14.18, 14.27, 14.28, 14.36(3), 14.37, 14.40, 14.56, and 14.75.
3. *Consolidated Practice Directions of the Court of Appeal of Alberta*
4. *Overview of Extracts of Key Evidence (Court of Appeal of Alberta)*
5. Such further and other acts, regulations and rules as counsel shall advise.