

**UNOFFICIAL TRANSLATION OF
THE AFFIDAVIT OF AURÉLIE LACASSAGNE
SWORN ON MARCH 29, 2021**

COURT FILE NO.: CV-21-656040-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, RSC 1985,
c C-36

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
LAURENTIAN UNIVERSITY OF SUDBURY

**AFFIDAVIT OF AURÉLIE LACASSAGNE
(March 29, 2021)**

I the undersigned, AURÉLIE LACASSAGNE, of the city of Montréal in the province of Québec
AFFIRM that:

1. I have been an associate professor of Political Science at Laurentian University (LU) since 2006. I served as head of the Political Science Department at LU from 2012 to 2013, and as Francophone Associate Dean of the Faculty of Social Sciences and Humanities at LU from 2010 to 2013. As such, I have personal knowledge of the facts set out in this affidavit, except where they are otherwise stated to be based on information or belief.
2. In my 15 years as a professor, I have found that although LU describes itself as a “bilingual” and tricultural university, LU does not provide equitable access to French-language and English-language courses and neglects its Francophone faculty. This is illustrated by the following examples.
3. When the previous President and Vice-Chancellor, Dominic Giroux, began his term in 2008, I wrote a letter to him denouncing the decline in enrolment in French-language programs at LU and recommending measures to promote the recruitment of Francophone students from abroad. I never received a response to my letter.
4. In 2010-2011, I was a member of the Steering Committee for LU’s very first strategic plan (2012-2017). I was the only Francophone faculty member on the committee, and at that time, all my teaching was in English.
5. The first draft of the strategic plan presented to us by the LU administration identified “signature programs” that LU would support financially and promote across Canada. The first draft did not have any French-language programs among the “signature programs.” I pointed out this omission to the other members of the Steering Committee, and after I insisted, they agreed to designate some French-language programs as “signature programs.” I had to press even harder to convince them to give this designation to the history and theatre programs. In

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the end, of the 13 undergraduate “signature programs,” only five were French-language programs (Education, Midwifery, History, Theatre, and Nursing Sciences), and not a single one of the six graduate “signature programs” was offered in French. Attached to this affidavit as **exhibit AL-1** is a true copy of the strategic plan, accessible at the following link: https://stor.laurentian.ca/www_laurentian_ca/sites/default/files/misc_files/About_LU/Documents/StratPlanElec_ENG_Jan2012.pdf.

6. Although it had designated the History and Theatre programs as “signature programs”, LU did not invest in these programs or promote them. The Theatre Department had only one full-time professor, and the number of Francophone professors in the History Department decreased.
7. In its strategic plan (2012-2017) (Exhibit AL-1), LU also committed to “support [its] high quality French-language programs including those that respond to community need for services in health, education, culture, and business” and, by 2017, to launch “new programs [...] responding to community needs, including [...] theatre and Franco-Ontarian literature.” LU has not followed through on these commitments.
8. Since LU has not honoured its commitments regarding French-language programming and teaching in the past, I do not believe the President and Vice-Chancellor, Robert Haché, when he states that he is “committed to the future of Laurentian as a university where French-language programming and teaching is valued and our bilingual character celebrated” in a message of March 16, 2021, accessible at the following link: <https://www.laurentianu.info/a-beacon-of-ontarios-francophonie/>.
9. In its strategic plan (2012-2017) (Exhibit AL-1), LU states that: “Laurentian University with its federated partners offers an outstanding university experience, in English and French.” I can attest to the fact that this did not reflect the situation in 2011, and it still does not reflect the reality today.
10. Faculty contracts at LU specify whether professors are hired to teach in French or English. Currently, if professors hired to teach in English (like myself) did not decide to teach additional courses in French, a number of French-language courses would no longer be offered. Also, if professors hired to teach in English did not decide to teach additional courses in French, a number of programs could no longer be offered in French because they do not have enough faculty members (some programs have just one or two professors, including the following: Law and Justice, Francophone Literature and Culture, French as a Second Language, and Economics).
11. LU has a policy of not replacing tenured faculty members, including when they retire. The reduction in the number of faculty members leads to a reduction in the number of courses and programs offered in French-language programs. For example, in the Political Science Department, the number of professors hired to teach in French was reduced from four in 2010 to one since 2018. Around 2011, the two professors in the Political Science Department who were experts in public administration and had been hired to teach in French left LU; LU did

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not replace them, and enrolment in the public administration program was suspended. In 2018, a third professor in the Political Science Department hired to teach in French left LU. This professor usually taught five courses in French. The fourth and final professor in the Political Science Department hired to teach in French worked intermittently and was on leave a number of times from 2016 to 2018; since 2018, his course load has been reduced. To fill the gaps resulting from these departures and absences, LU hired a single lecturer (responsible for teaching two courses in French), which is not enough to maintain the department's French-language course offering as it was in 2018. In the fall of 2018, LU suspended enrolment in the French-language Political Science program (the specialization and the major). The only major now available in French is Law and Politics.

12. In 2013, I was a member of the coordinating committee of the Provincial Forum on Post-Secondary Education in French Ontario. As part of this Provincial Forum, the *Regroupement étudiant franco-ontarien* [Franco-Ontarian Student Organization], in partnership with the *Assemblée de la francophonie de l'Ontario* and the Fédération de la jeunesse franco-ontarienne [Franco-Ontarian Youth Federation], organized six regional consultations and four youth consultations to provide an overview of the population's needs and expectations in a number of areas affecting the future of French-language post-secondary education in Ontario. Out of these consultations, a consensus emerged on the need for a post-secondary network managed "by" and "for" Ontario's Francophones. Attached to this affidavit as **Exhibit AL-2** is a true copy of the report (dated September 26, 2014) that resulted from the regional and youth consultations conducted as part of the Provincial Forum on Post-Secondary Education in French Ontario, accessible at the following link:
<http://etatsgeneraux.ca/resources/Rapport%20des%20consultations%20de%20l'automne%202013%20-%20États%20généraux%20sur%20le%20postsecondaire%20en%20Ontario%20français.pdf>
13. I was the only LU professor on the coordinating committee.
14. On Saturday, November 2, 2013, the then President and Vice-Chancellor, Dominic Giroux, and I were at École secondaire du Sacré-Cœur in Sudbury for one of the regional consultations of the Provincial Forum on Post-Secondary Education in French Ontario. President Giroux asked me privately to step down from the coordinating committee of the Provincial Forum on Post-Secondary Education in French Ontario. I replied that I would not step down from the coordinating committee. During the same conversation, President Giroux also told me and I believe that he was working on a way to prevent the project of establishing a Francophone university in Ontario from going forward.
15. In the Report of the Provincial Summit of the Provincial Forum on Post-Secondary Education in French Ontario, a summit held in Toronto in October 2014 as the culmination of regional and youth consultations conducted in the fall of 2013, including the regional consultation in Sudbury in which I took part, four priorities were identified. These included:

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- a. “enhance access to French-language programs, particularly in Central Ontario where the gap between the Franco-Ontarian population and the inadequate offering of programs is greatest, but also in Eastern and Northern [Ontario]”; and
- b. “obtain university governance by and for Franco-Ontarians, i.e. an institution designed specifically for them and one that is managed and controlled by them. This must not be limited to the advisory management of programs, but must also extend to administration, finances, student life, academic activities, research, and physical facilities.”

Attached to this affidavit as **Exhibit AL-3** is a true copy of this report dated February 10, 2015, accessible at the following link:

<http://etatsgeneraux.ca/resources/Rapport%20du%20Sommet%20provincial%20des%20%C3%89tats%20g%C3%A9n%C3%A9raux%20sur%20le%20postsecondaire%20en%20Ontario%20fran%C3%A7ais.pdf>.

16. The Report of the Provincial Summit of the Provincial Forum on Post-Secondary Education in French Ontario (Exhibit AL-3) also states the following:

While the scenario of a new French-language university was favoured by the overwhelming majority of participants, a student from Laurentian University suggested that “perhaps we could start with another model [the division of a bilingual university or the creation of a new entity within it] to begin a transition toward that ideal.” Thus, we would start with the division of existing bilingual universities. For example, the University of Ottawa and Laurentian University would be split, resulting in two smaller French-language universities and two additional English-language universities. Funding, administrators, employees, professors, pavilions and student services would be divided in order to integrate French-language programs and their management within a new French-language institution. [at p. 19]

[...]

With the exception of administrators of bilingual universities, who expressed strong reservations about all the models, there was a consensus among participants in the six sessions of this workshop. There was almost unanimous support for the first model, i.e. the establishment of an independent French-language university. Others saw the establishment of an affiliated or federated university as an interim solution that could plausibly allow an independent French-language university to emerge seamlessly in the not-too-distant future. [at p. 26]

17. In 2014, LU was designated as a public service agency within the meaning of of the *French Language Services Act*. President Giroux touted this designation as a concrete commitment by LU to French at the university. I did not notice any concrete improvement in the offering of French-language programs, courses and services after this designation. I was disappointed to learn that according to LU, “[t]he partial designation was not intended to, nor does it

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guarantee: (a) “[t]he delivery of a specific program or course in French,” (b) “[a] minimum number of French-language courses or programs” or (c) “[a] minimum number of Francophone faculty university-wide or by department or school.” Attached to this affidavit as **Exhibit AL-4** is a true copy of the page of LU’s website on which this information appears, accessible at the following link: <https://laurentian.ca/francophone-affairs/institutional-bilingualism>.

18. Contrary to LU’s policy on bilingualism (art. 9.4), there are many professors at LU who do not understand French, which undermines the mandate of LU’s Research Ethics Board. This Board reviews all research involving human participants and ensures that they are respected. When I was a member of the Research Ethics Board from September 2015 to July 2016, only one other person among its twelve members was a Francophone. The other ten members did not understand French. As a result, the other Francophone professor and I were responsible for all applications in French. That meant that if one of us had a conflict of interest, the review was done by a single person.
19. Since LU does not provide equitable access to French-language and English-language courses and neglects its Francophone faculty, I am concerned that this negative treatment will be exacerbated during and after the proceedings under the *Companies’ Creditors Arrangement Act*. Attached to this affidavit as **Exhibit AL-5** is a true copy of an article dated March 10, 2021 in which I am quoted expressing this view, accessible at the following link: <https://www.lavoixdunord.ca/actualites/francophonie/universite-laurentienne-la-banqueroute-pour-mieux-couper-3f3fabdfd6b3c03f1c270294db5d35a2?sourceOrganizationKey=le-voyageur>
20. On March 2, 2021, I participated in a round table entitled “Laurentian University and the challenges facing French-language teaching in Northern Ontario,” organized by *the Collège des chaires de recherche sur le monde francophone* [College of research chairs in the Francophone world] of the University of Ottawa. It included five guest professors – four from LU (including myself), and one from the University of Sudbury. The key takeaway of this round table is that LU’s bilingualism does not meet the expectations of the French-speaking minority, particularly when it comes to access to quality French-language programs and the status and use of French. Attached to this affidavit as **Exhibit AL-6** and **Exhibit AL-7** are true copies of articles on this round table, dated March 9, 2021 and March 2, 2021 respectively, accessible at the following links: <https://www.lavoixdunord.ca/actualites/education/une-universite-francophone-a-sudbury-77511210d41f01b790694d04600bdf9e?sourceOrganizationKey=le-voyageur>
and

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<https://www.lavoixdunord.ca/actualites/education/une-universite-bilingue-qui-ne-reve-pas-en-francais-bec42ef7242a99fec73c641f8bd2c55d?sourceOrganizationKey=le-voyageur>.

Sworn remotely by Aurélie Lacassagne in the city of Montréal in the province of Québec, before me in the city of Richmond in the province of British Columbia, on March 29, 2021, in accordance with O. Reg. 431/20 *Administering Oath or Declaration Remotely*.

AURÉLIE LACASSAGNE