

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

IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

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

**RESPONDING MOTION RECORD
(Re: FIPPA Stay)
(Returnable April 1, 2022)**

March 23, 2022

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

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

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

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

RESPONDING MOTION RECORD

**INDEX
(Re: FIPPA Stay)
(Returnable April 1, 2022)**

Tab	Document
1.	Affidavit of Bobbie-Jo Brinkman sworn on March 23, 2022
A.	Letter from Thornton Grout Finnigan LLP to Information and Privacy Commissioner of Ontario dated March 23, 2022
2.	Draft Consent Order

TAB 1

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

IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

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

Applicant

AFFIDAVIT OF BOBBIE-JO BRINKMAN

(sworn March 23, 2022)

I, Bobbie-Jo Brinkman, of the City of Oshawa, in the Regional Municipality of Durham, in the Province of Ontario, **MAKE OATH AND SAY AS FOLLOWS:**

I. INTRODUCTION

1. I am a law clerk at Thornton Grout Finnigan LLP (“**TGF**”), lawyers for Laurentian University of Sudbury (“**Laurentian**”). As such, I have knowledge of the matters hereinafter deposed to, save where I have obtained information from others. Where I do not possess personal knowledge, I have stated the source of my information and belief and, in all such cases, believe such information to be true.
2. I am advised by Mitch Grossell, a lawyer at TGF, that on March 9, 2022, the Information and Privacy Commissioner of Ontario (the “**IPC**”) served a motion record and factum that sought to vary the Amended and Restated Initial Order dated February 11, 2021.
3. On March 23, 2022, Mr. Grossell wrote a letter to Ms. Linda Chen, counsel to the IPC. The letter provides that Laurentian has agreed to proceed with the IPC’s motion on a

consensual basis in accordance with the terms of the draft order enclosed to the letter. A copy of that letter is attached hereto as **Exhibit "A"**.

VII. CONCLUSION

4. This affidavit is sworn in respect of the motion commenced by the IPC and for no other or improper purpose.

SWORN remotely via videoconference, by Bobbie-Jo Brinkman stated as being located in the City of Oshawa, in the Regional Municipality of Durham, in the Province of Ontario, before me at the City of Toronto, in Province of Ontario, this 23rd day of March, 2022, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*



Commissioner for Taking Affidavits, etc.

Mitchell W. Grossell
LSO # 69993I



BOBBIE-JO BRINKMAN

This is Exhibit "A" referred to in the Affidavit of Bobbie-Jo Brinkman sworn by Bobbie-Jo Brinkman of the City of Oshawa, in the Regional Municipality of Durham, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on March 23, 2022 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

A handwritten signature in blue ink, appearing to be 'M. Paul', is written above a horizontal line.

Commissioner for Taking Affidavits (or as may be)

March 23, 2022

VIA EMAIL

Office of the Information and Privacy
Commissioner of Ontario
2 Bloor Street East
Suite 1400
Toronto, ON M4W 1A8

Attention: Linda Chen

Dear Ms. Chen:

Re: In the Matter of the *Companies' Creditors Arrangement Act* Proceedings of Laurentian University of Sudbury ("Laurentian"), (Court File No.: CV-21-00656040-00CL)

We write in respect of the motion returnable on April 1, 2022, whereby the Information and Privacy Commissioner of Ontario (the "IPC") seeks to vary the stay of proceedings granted by the Amended and Restated Initial Order dated February 11, 2021 (the "Initial Order"). For the purposes of this letter, we refer to any information request made under the *Freedom of Information and Protection of Privacy Act* as a "FOI Request".

Prior to the commencement of the CCAA proceeding, there were two outstanding FOI Requests. Since the commencement of the CCAA proceeding, Laurentian received one FOI Request. As of today's date, three FOI Requests are stayed pursuant to the Initial Order.

In January 2022, Laurentian advised the IPC that it received a fourth FOI Request that would be subject to the stay. Upon further review, Laurentian concluded that this request is not an information request under FIPPA. Rather, it is an academic issue between that individual and Laurentian.

As you are aware, Laurentian sought the extension of the stay of proceedings to FOI Requests because Laurentian was concerned that it would receive a high volume of FOI Requests following the commencement of the CCAA proceeding, or that even if the number of requests itself did not evidence an increased volume, the nature of the requests would involve a significant amount of work and time to comply.

Laurentian acknowledges its statutory duty of access to information as required under FIPPA. Prior to the CCAA proceeding, Laurentian provided access to information that is permitted under FIPPA, subject to the exemptions provided for in FIPPA.

Based on the facts and circumstances as of today's date, including our recent discussions, we confirm that Laurentian is agreeable to proceed with the IPC's motion on a consensual basis based on the enclosed form of draft order.



Thornton Grout Finnigan LLP

2.

Yours truly,

Thornton Grout Finnigan LLP

A handwritten signature in black ink, appearing to read 'M. Grossell', written over a horizontal line.

Mitchell W. Grossell

MWG

Encl.

cc: *Laurentian University of Sudbury*
Sharon Hamilton, Ernst & Young Inc.
Ashley Taylor / Elizabeth Pillon, Stikeman Elliott LLP

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE CHIEF)
JUSTICE MORAWETZ)
FRIDAY, THE 1ST
DAY OF APRIL, 2022

IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

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

Applicant

CONSENT ORDER

THIS MOTION, brought by the Information and Privacy Commissioner of Ontario (the “**IPC**”) to vary the Amended and Restated Initial Order dated February 11, 2021 (the “**Initial Order**”) to remove the stay of Laurentian University of Sudbury (the “**Applicant**”)’s obligations to respond to requests for information (“**FOI Requests**”) made under the *Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. F. 31 (“**FIPPA**”) proceeded on an unopposed basis on April 1, 2022 by virtual hearing via Zoom in Toronto, Ontario.

ON READING the Motion Record of the IPC dated March 9, 2022, the affidavit of Christian Aviles sworn March 8, 2022, the Responding Motion Record of the Applicant dated March 23, 2022, the affidavit of Bobbie-Jo Brinkman sworn March 23, 2022, the Eleventh Report of Ernst & Young Inc. in its capacity as court-appointed Monitor (the “**Monitor**”), the Factum of the IPC dated March 9, 2022, and the Factum of Canadian Association of University Teachers dated March 11, 2022, and on hearing the submissions of counsel for the IPC, counsel for the Applicant, counsel for the Monitor, and those other parties listed on the Counsel Slip, no one else appearing although duly served with the Applicant’s Motion Record as appears from the Affidavit of Service of Khadija Waqqas sworn March [▶], 2022.

AND UPON BEING ADVISED that the IPC and the Applicant consent to the terms of this Order, and that the Monitor supports the terms set out in this Order,

SERVICE AND DEFINITIONS

1. **THIS COURT ORDERS** that service of the IPC's Notice of Motion, the IPC Motion Record, and the Applicant's Responding Motion Record is hereby validated such that this Motion is properly returnable today.
2. **THIS COURT ORDERS** that capitalized terms used herein that are not otherwise defined shall have the meaning ascribed to them in the Initial Order.

TERMINATION OF STAY OF FOI REQUESTS

3. **THIS COURT ORDERS** that effective on May 1, 2022, the following language in paragraph 21 of the Initial Order shall be deleted, without any further steps having to be taken by any party: "including any existing, pending or future information requests made to the Applicant under the *Freedom of Information and Protection of Privacy Act*".
 4. **THIS COURT ORDERS** that notwithstanding paragraph 3 of this Order, the Applicant reserves its right to return to the Court for the purpose of seeking further direction or relief in the event that the Applicant receives one or more FOI Requests that would require the Applicant to expend significant efforts or take steps within a timeframe that would result in the Applicant being unable to focus its limited resources on the advancement of the CCAA proceedings. The Applicant shall provide notice to the IPC that it intends to seek further direction or relief from the Court and shall consult with the IPC regarding scheduling such a date.
 5. **THIS COURT ORDERS** that no costs shall be awarded with respect to this motion.
-

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

Proceeding commenced at Toronto

CONSENT ORDER

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IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

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Court File No. 21-CV-656040-00CL

ONTARIO
**SUPERIOR COURT OF JUSTICE
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Proceedings commenced at Toronto

AFFIDAVIT OF BOBBIE-JO BRINKMAN

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TAB 2

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE CHIEF) FRIDAY, THE 1ST
)
JUSTICE MORAWETZ) DAY OF APRIL, 2022

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

Court File No. 21-CV-656040-00CL

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

Proceedings commenced at Toronto

**RESPONDING MOTION RECORD
(Re: FIPPA Stay)
(Returnable April 1, 2022)**

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