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Our File: ORO 2-571054-2
Notre dossier:

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December 23, 2015

VIA FACSIMILE

Roger Bilodeau, Q.C.
Registrar
Supreme Court of Canada
301 Wellington Street
Ottawa, Ontario
K1A 0J1

Dear Sir:

**Re: Mounted Police Association of Ontario/Association De La Police Montee De L'Ontario and B.C. Mounted Police Professional Association on their own behalf and on behalf of all members and employees of the RCMP
Court File No.: 34948**

The Attorney General of Canada responds to the letter dated December 16, from James R.K. Duggan counsel for the intervener Association des Membres de la Police Montee du Quebec (AMPMQ).

AMPMQ was granted intervener status in this appeal by Order of Lebel J. dated July 25, 2013. That Order specifically provided "The interveners are not entitled to raise new issues or to adduce further evidence or otherwise to supplement the record of the parties."

AMPMQ is not a party, and has no standing to make submissions in this motion. It, and all other interveners were served with the Attorney General's motion as a courtesy.


Further, AMPMQ makes unsupported allegations of fact contrary to the limited basis upon which it was allowed to intervene in the appeal argued on February 18, 2014. The unsupported allegations (particularly at paragraph 2 (i) and (j) of the letter) are both improper and inflammatory.

Though further response should be unnecessary, the Attorney General of Canada also notes that the remedies sought by the AMPMQ would amount to the RCMP providing an advantage to certain associations over others which may also wish to seek to represent RCMP members and therefore the proposed remedies are inappropriate.

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The Attorney General of Canada submits that this Court should wholly disregard the improper submissions of the intervener AMPMQ.

Yours truly,



for Peter Southey
Senior General Counsel
Business & Regulatory Law Division
PS:jt

c. All Parties