

Your Application has been scheduled by the clerk.

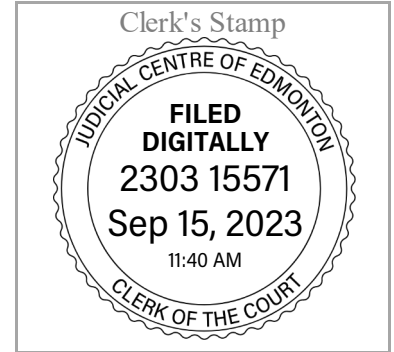
**Date:** Oct 3, 2023 @ 10:00

**Location:** Civil Justice Chambers

**In person:** 1A Sir Winston Churchill Square,  
Edmonton, AB T5J 0R2

**FORM 27**  
[RULES 6.3 AND 10.52(1)]

COURT FILE NO. 2303 15571  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE EDMONTON



PLAINTIFF(S) COALITION FOR JUSTICE AND HUMAN RIGHTS LTD.  
DEFENDANT(S) CITY OF EDMONTON  
APPLICANT **CHIEF OF POLICE, EDMONTON POLICE SERVICE**  
DOCUMENT **APPLICATION FOR INTERVENER STATUS**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT  
**BENNETT JONES LLP**  
Barristers and Solicitors  
4500 Bankers Hall East  
855 2<sup>nd</sup> Street SW  
Calgary, Alberta T2P 4K7

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Client File No.: 44238.177

**NOTICE TO RESPONDENT(S): COALITION FOR JUSTICE AND HUMAN RIGHTS LTD., AND CITY OF EDMONTON**

This application is made against you. You are a respondent.

You have the right to state your side of this matter before the Justice.

To do so, you must be in Court when the application is heard as shown below:

Date: October 3, 2023  
Time: 10:00 AM  
Where: Edmonton Law Courts  
Before Whom: Justice in Chambers, Alberta Court of King's Bench

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

**Remedy claimed or sought:**

1. The Applicant seeks an order granting intervener status to the Chief of Police of the Edmonton Police Service (the "**Chief**") on behalf of the Edmonton Police Service ("**EPS**") with the right and privilege to:
  - (a) examine and respond to evidence led by the Plaintiff alleging that the Chief, the EPS, or any of its officers have conducted themselves contrary to the *Charter*;
  - (b) provide this Honourable Court with evidence and submissions to assist in evaluating whether any *Charter* breach shown to have been committed by the Chief, the EPS, or any of its officers, in whole or in part, is reasonable and demonstrably justified;
  - (c) have input in to the final minutes of order insofar as police powers and discretion might reasonably be impacted;
  - (d) to be served with materials, as any other party to this matter is or would be, according to the *Alberta Rules of Court*; and
  - (e) provide such further assistance as may be required or requested and permitted by this Honourable Court.
  
2. The Applicant takes no position with respect to the injunction sought by the Plaintiff, but the evidence and submissions it might provide are necessary if this Honourable Court is to render a full and fair decision with respect to this Action.

**Grounds for making this application:**

3. The Chief is the head of the EPS. The Chief and EPS are overseen by the Edmonton Police Commission. Actions purportedly taken by the EPS and its police officers are cited by the Plaintiff in its Application for injunctive relief.
  
4. The EPS has a specific and significant interest in the outcome of the Action and this Application. The Chief and EPS have an interest in ensuring that the actions of EPS officers are properly represented in full context. Ensuring that police actions are accurately depicted

before this Honourable Court is important to maintaining public confidence in the police and the administration of justice.

5. The evidence and perspective of the EPS is material, relevant, and unique in the context of this application, and are not within the purview and actual knowledge of the Defendant City.
6. The allegations on which the Plaintiff relies involve EPS officers. EPS officers are not servants or officers of or to the Defendant City at any time, and so should be named in any effective Order for injunctive relief. Being named in any resulting Order would affect the EPS, the Chief, and police officers.
7. Any final minutes of order should not estop police from enforcing the *Criminal Code of Canada* or performing other common-law or statutory duties. Allowing this Honourable Court to benefit from the representations of the Chief enhances it in its truth-seeking function, and may sharpen the focus of any resulting Order.
8. The EPS will be timely in its response to this non-emergency matter if granted intervener status, such that there will be no functional delay or other like prejudice to the Plaintiff.
9. The EPS and EPS officers have the right to respond to allegations made against them on the Record pursuant to the principles of natural justice, including *audi alterem partem*.

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

10. The Pleadings and evidence on Record for this matter.
11. Such other material or evidence that Counsel may propose and this Honourable Court might allow.

**Applicable Rules:**

12. *Alberta Rules of Court*, Alta Reg 124/2010, rule 2.10.

**Applicable Acts and Regulations:**

13. *Police Act*, RSA 2000, c P-17.

**Any irregularity complained of or objection relied on:**

14. The Applicant has not reviewed or examined any Affidavit evidence in this matter.

**How the application is proposed to be heard or considered:**

15. In person.

**WARNING**

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 give evidence in response to the application, you must reply by filing an affidavit or other evidence with the Court and serving a copy of that affidavit or other evidence on the applicant(s) a reasonable time before the application is to be heard or considered.