

August 10, 2022

File No. 3540-005

VIA EMAIL

Clea Parfitt
407 – 825 Granville Street
Vancouver, BC V6Z 1K9

Dear Ms. Parfitt:

Re: *Glynnis Kirchmeier and Glynnis Kirchmeier obo others v. University of British Columbia* (Case Number CS-001093 / 14965)

We write with respect to the Complainant's witness list and statement of remedy filed with the Tribunal.

The witness list filed by the Complainant is insufficient to meet the Tribunal's Rules. In particular, the witness list contains five anonymous witnesses. Two witnesses are listed simply as "Student B" and "Student F". Three expert witnesses are described only by their area of expertise. As a matter of fairness, the Complainant must disclose the names of all of the witnesses she intends to call of the hearing.

Please update the Complainant's witness list with the identities of this witness and provide the updated list to both the Respondent and the Tribunal.

The Form 9.4 disclosed by the Complainant is also deficient. The Rules require the Complainant to set out the details of the remedies sought by her under section 37 of the *Code*. While the Complainant has particularized in great detail the non-monetary remedies sought by her, she has provided no details of the monetary remedies sought. In particular, she has not set out the amounts she is seeking for injury to dignity, expenses, lost wages, or any other heads of damages.

The Complainant has also not identified the members of the classes seeking these damages. In the absence of identifying the class members seeking the damages, it is impossible for the Respondent or the Tribunal to attempt to quantify the Complainant's requests.

Please update the Complainant's witness list to quantify the damages being sought by her under each head of damages and the class members claiming each head of damages.

Further, the Complainant has not filed a Form 9.5 listing the documents relevant to the remedies sought, nor has she provided disclosure of any such documents.



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Please provide the Complainant's Form 9.5 and copies of all relevant documents.

If the Complainant is not willing to make the requested updates, please notify us immediately so that we may make an application to the Tribunal.

Yours very truly,

Roper Greyell LLP

Per:

A handwritten signature in black ink, appearing to read 'J Devins', written in a cursive style.

Jennifer Devins

JRD:JRD

cc. Client