

**IN THE SUPREME COURT OF CANADA**  
(On Appeal from the Court of Appeal for Quebec)

**B E T W E E N:**

**JACQUES CHAOULLI and GEORGE ZELIOTIS**

**APPELLANTS**  
(Appellants)

- and -

**ATTORNEY GENERAL OF QUEBEC**

**RESPONDENT**  
(Respondent)

- and -

**ATTORNEY GENERAL OF CANADA**

**RESPONDENT**  
(Respondent)

- and -

**ATTORNEY GENERAL OF BRITISH COLUMBIA,  
ATTORNEY GENERAL OF ONTARIO  
ATTORNEY GENERAL OF MANITOBA  
ATTORNEY GENERAL OF NEW BRUNSWICK  
ATTORNEY GENERAL OF SASKATCHEWAN**

**INTERVENERS**

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**NOTICE OF MOTION FOR LEAVE TO INTERVENE**

**by the Canadian Labour Congress**  
under Rules 55 and 56 of the *Rules of the Supreme Court of Canada*

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**TAKE NOTICE THAT** the Moving Party, the Canadian Labour Congress (the "CLC"), hereby applies to a Judge of this Court, pursuant to Rules 55 and 56 of the *Rules of the Supreme Court of Canada*, for:

1. an Order granting the CLC leave to intervene in the present appeal;
2. an Order granting the CLC leave to file a factum of not more than 30 pages (or such other length as the said Judge may deem appropriate);
3. an Order granting the CLC leave to present oral argument at the hearing of the appeal of not more than 30 minutes (or such other duration as the said Judge may deem appropriate); and
4. such further or other Order that the said Judge may deem appropriate.

**AND FURTHER TAKE NOTICE THAT** the following documents will be referred to in support of the said motion:

1. the Affidavit of Barb Byers sworn, December 10, 2003; and
2. Such further and other material as counsel may advise and as may be permitted.

**AND FURTHER TAKE NOTICE** that the said motion shall be made on the following grounds:

1. As evidenced in the affidavit of Barb Byers, the CLC has a genuine and substantial interest in the appeal;
2. The CLC's submissions will be of assistance to this Court in its deliberations because of their relevance and uniqueness, and also because of the expertise that it brings to the proceeding;
3. The CLC will be prejudiced if it is not granted leave to intervene in the appeal because no other party can represent its interests and perspective;

4. The CLC will make submissions that are different from those of the other parties in the proceeding; and

5. Rules 55 and 56 of the *Rules of the Supreme Court of Canada*.

Dated at Toronto, Ontario this 10<sup>th</sup> day of December, 2003.

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