



Legal Citation: *Canadian Guide to Uniform Legal Citation*, 8th ed [the *McGill Guide*]

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Most Important sections

- ▶ The most useful and valuable sections of the *McGill Guide* are:
 - ▶ Chapter 1: General Rules, and
 - ▶ The first entry for each topic, “General Form” (several per chapter)
- ▶ I find myself “building” my own citations often, for some documents – especially online materials and government documents.

Bibliographies 1

- ▶ Separated by topic (LEGISLATION, JURISPRUDENCE, SECONDARY MATERIALS: MONOGRAPHS, SECONDARY MATERIALS: ARTICLES....);
- ▶ Two spaces between entries, use a hanging indent;
- ▶ Alphabetized:
 - ▶ Legislation by title, jurisprudence by style of cause, secondary materials by author's last name.
 - ▶ Even if it leads to inconsistency in referencing an author's work, cite using the name exactly as it appears on the material you are referencing.
 - ▶ Last name first only for the first author in a list, if there is more than one author. If there are more than 3 authors, use et al.
 - ▶ Chisholm, Amber & Reid Lodge Title... ;
 - ▶ Chisholm, Amber, Reid Lodge & Stevie Nicks Title... ;
 - ▶ Chisholm, Amber et al, Title...
- ▶ Multiple works by one author: lone author first, then cite the materials with co-authors, alphabetized by the last name of the next author listed;
- ▶ **No Periods.** This one is easy to overlook, because copied and pasted citation information invariably has periods that students should remember to remove manually.

Bibliographies 2

Works Cited

Case Law

- B v A* [1990] OJ No 1751. QL.
- Canada (Attorney General) v Canada (Canadian Human Rights Commission)* [2003] FCJ No 117. QL.
- Canada v. Owen* [1993] FCJ No 1263. QL.
- CF v Alberta (Vital Statistics)* [2014] AJ No 420. QL.
- Corbett v Corbett* [1970] 2 ALL ER 93 (PBD). QL.
- Go v Canada (Minister of Citizenship and Immigration)* [2015] FCJ No 620, [2015] ACF no 620. QL.
- Hawes v Hazan* [2009] MJ No 287, 2009 MBQB 212. QL.
- Hogan v Ontario (Minister of Health and Long Term Care)* [2006] OHRTD No 34, 2006 HRTD 32. QL.
- HP v PLC* [2013] OJ No 3377. QL.
- JDM v LM* [2012] NSJ No 110. QL.
- KAB v Ontario (Registrar General)* [2013] OJ No 5609. QL.
- MacDonald v Downtown Health Club for Women* [2009] OHRTD No 1025. QL.
- Mamela v Vancouver Lesbian Connection* [1999] BCHRTD No 51. QL.
- Merner (Re)* [2014] ORBD No 1350. QL.
- Nixon v Rape Relief* [2006] SCCA No 365. QL.
- Nixon v Vancouver Rape Relief Society (cob Rape Relief and Women's Shelter)* [2002] BCHRTD No 1, 2002 BCHRT 1. QL.
- R v Gunabalasingam* [2008] OJ No 1634 78 WCB (2d) 476. QL.
- RC v REH* [2014] BCJ No 3077. QL.
- Re Reid* 56 OR (2d) 61 [1986] OJ No 201. QL.
- Sheridan v Sanctuary Investments Ltd (cob BJ's Lounge)* [1999] BCHRTD No 43. QL.

Taylor (Re) [2005] ORBD No 1645, File No 0374. QL.

Taylor (Re) [2007] ORBD No 1531. QL.

Vancouver Rape Relief Society v Nixon [2003] BCJ No 2899 2003 BCSC 1936. QL.

Vancouver Rape Relief Society v Nixon [2005] B.C.J. No. 2647, 2005 BCCA 601. QL.

Vancouver Rape Relief Society v Nixon [2005] BCJ No 2647, 2005 BCCA 601. QL.

XY v Ontario (Minister of Government and Consumer Services) [2012] OHRTD No 715. QL.

Legislation

Vital Statistics Act, SNB 1979, c V-3 s. 34.

The Vital Statistics Act, 2009, SS 2009, c V-7.21 s. 31.

Books

American Psychiatric Association, ed. *Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition* 5th ed. Arlington VA: American Psychiatric Association, 2013. ebook: <doi:10.1176/appi.books.9780890425996>.

Judith Butler, "Bodily Inscriptions, Performative Subversions," [excerpt from *Gender Trouble* (1999)] in Warhol-Down and Herndl, eds., *Feminisms Redux* (2009), 465-476. e-book.

Eli Coleman et al., *Standards of Care for the Health of Transgender, Transsexual, and Gender-Nonconforming People*, (World Professional Association for Transgender Health, 2012). Online: <www.wpath.org/site_page.cfm?pk_association_webpage_menu=1351&pk_association_webpage=3926>.

Shiri Eisner, *Bi Notes for a Btsexual Revolution* (California: Seal Press, 2013).

Gary Kinsman, *The Regulation of Desire: Homo and Hetero Sexualities* (Montral: Black Rose Books, 1996). Print.

Jay Prosser, *Second Skins* (New York: Columbia University Press, 1998). Print.

Julia Serano, *Excluded* (California: Seal Press, 2013). Print.

Julia Serano, *Whipping Girl* (California: Seal Press, 2007). Print.

Online Materials

Christian Williams, "You Might be a TERF If..." *The Transadvocate* (24 September 2013) online: <www.transadvocate.com/you-might-be-a-terf-if_n_10226.htm>.

"How Common is Intersex? An Explanation of the Stats" *The United States affiliate of the Organization Intersex International (OII)* (1 April 2015) online: <oii-usa.org/2563/how-common-is-intersex-in-humans/>.

Janyce McGregor "Transgender Rights Bill Gutted by 'Transphobic' Senate Amendment" *CBC News* (27 February 2015) online: <www.cbc.ca/news/politics/transgender-rights-bill-gutted-by-transphobic-senate-amendment-1.2975024>.

Lauren Strapagiel, "Ontario Will Now Assess Transgender Inmates Based on Identity, Not Anatomy" *The National Post* (26 January 2015) online: <news.nationalpost.com/news/canada/ontario-will-now-assess-transgender-inmates-based-on-identity-not-anatomy>.

"On Women-Only Spaces" *Vancouver Rape Relief and Women's Shelter* online: <www.rapereliefshelter.bc.ca/shelter-movement/women-only-space/women-only-space>.

Bibliographies 3

Case law

Bellinger v Bellinger [2003] UKHL 21, (pinpoint) (UK) [*Bellinger*]. (QL).

Edwards v Canada [1930] AC 124.

Hogan v Ontario [2006] OHR TD No 34, 2006 HRTO 32, 58 CHRR D/317. [*Hogan*]. (QL).

Kavanaugh v Canada [2001] CHR D No 201, 41 DHRR D/119. [*Kavanaugh*]. (QL).

Nixon v Rape Relief [2005] BCCA 601, 262 DLR 4th 360. [*Nixon*]. (QL).

Sheridan v Sanctuary Investments Ltd [1999] BCHRTD No. 43, 33 CHRR D/467, 1999

CarsellBC 3175. [*Sheridan*]. (QL).

XY v Ontario [2012] OHR TD No 175, 2012 HRTO 726, 74 CHRR D/2331 [XY]. (QL).

No period – this may however appear as X.Y. in some databases

No periods for any abbreviations

Legislation

Civil Marriage Act, RSC 2005, c. 33.

Criminal Code, RSC 1985, c C-46 ss. 162, 265, 271, 272, 273.

Bill 140, *Transgendered Persons Protection Act (amendments to the Human Rights Act)*, 4th Sess, 61st Leg, Nova Scotia, 2012 (assented to 6 December 2012) RSNS 1989 c. 214.

Bill C-279, *An Act to amend the Canadian Human Rights Act and the Criminal Code (gender identity)* 1st Sess, 41st Parl, 2013 (as passed by the House of Commons 16 October 2013).

Human Rights Act, RSNB 2011, c171.

Human Rights Act, RSNS 1989, c. 214.

Human Rights Code, RSO 1990, c. H-19.

NB Reg 84-20, Schedule 2(p).

Hansards

House of Commons, Standing Committee on Justice and Human Rights, *An Act to amend the Canadian Human Rights Act and the Criminal Code (gender identity)* (20 November 2012).

House of Commons, Standing Committee on Justice and Human Rights, *An Act to amend the Canadian Human Rights Act and the Criminal Code (gender identity)* (27 November 2012).

Nova Scotia, Legislative Assembly, *Hansard*, 61st Leg, 4th Sess, (23 November 2012).

Nova Scotia, Legislative Assembly, *Hansard*, 61st Leg, 4th Sess, (27 November 2012).

Nova Scotia, Legislative Assembly, *Hansard*, 61st Leg, 4th Sess, (30 November 2012).

Ontario, Legislative Assembly, *Official Report of Debates (Hansard)*, 40th Leg, 1st Sess, (10 May 2012).

Ontario, Legislative Assembly, *Official Report of Debates (Hansard)*, 40th Leg, 1st Sess, (13 June 2012).

No superscript

Footnotes 1

- ▶ Use numbers, and use the same font (but smaller) as the main body of the paper;
- ▶ Separate Multiple citations within one footnote by using a semi-colon; finish footnotes with a period;
- ▶ ***Ibid*** (*Ibidem*) - “in the same place” - refers the reader to the source(s) cited in the footnote immediately before it:
 - ▶ Can be used after another *Ibid* after a *supra*, or after a full citation;
 - ▶ Use *Ibid* at 75 to indicate the cited passage is in the immediately preceding source at paragraph 75;
 - ▶ Without a pinpoint, *ibid* indicates the same pinpoint used in the previous footnote;
- ▶ ***supra*** -- “above” – uses a short form of the source title and refers back to an earlier citation to save from rewriting full citation every time a source is used:
 - ▶ *Jobidon, supra* note 8.
 - ▶ *Jobidon, supra* note 8 at 15.
 - ▶ *Supra* note 1 at 58 -- for citations when the source is identified in the main text; no need to repeat it in the footnote.
- ▶ ***Infra*** -- “below” - similar to *supra* but refers to a footnote which comes later. Rarely used, and not recommended.

Footnotes 2

³⁰ WPATH *Standards of Care*, 2012 *supra* note 12 at 18-19.

³¹ Bethany Gibson and Anita J. Caitlin, "Care of the Child with the Desire to Change Gender," *Urologic Nursing*, 36.1 (2010): 222-9 at 15.

³² Spack et al., *Pediatrics*, 2012 *supra* note 9 at 419; "For boys, Tanner stage 2 is defined as testicular growth to a volume of more than 4ml. For girls, Tanner stage 2 is defined as the start of breast development, with palpable buds and enlargement of the areolae. In both sexes, there should be a measurable production of gonadal sex steroid" (Ettner et al., *Transgender Medicine*, 2007 *supra* note 9 at 86).

³³ Spack et al., *Pediatrics*, 2012 *supra* note 9 at 423.

³⁴ WPATH *Standards of Care*, 2012 *supra* note 12 at 17.

³⁵ Gibson and Caitlin, *Urologic Nursing*, 2012 *supra* note 31; WPATH *Standards of Care*, 2012 *supra* note 12 at 18-19; Ettner et al., *Transgender Medicine*, 2007 *supra* note 9 at 86.

³⁶ Spack et al., *Pediatrics*, 2012 *supra* note 9 at 419.

³⁷ *Ibid.*

³⁸ Gibson and Caitlin, *Urologic Nursing*, 2012 *supra* note 31 at 56; WPATH *Standards of Care*, 2012 *supra* note 12 at 17-18.

³⁹ *Ibid.*

Author's first name first in footnotes

Supra – refers the reader to the full citation in footnote 9

Ibid – referring to the same source as footnote 43

⁴⁰ *Ibid.*; WPATH *Standards of Care*, 2012 *supra* note 12 at 19.

⁴¹ Spack et al., *Pediatrics*, 2012 *supra* note 9 at 419. Ettner et al., *Transgender Medicine*, 2007 *supra* note 9 at 86.

⁴² *Ibid.*; WPATH *Standards of Care*, 2012 *supra* note 12 at 11. All 70 children went on to access HRT and gender confirming surgeries.

⁴³ WPATH *Standards of Care*, 2012 *supra* note 12 at 19; Ettner et al., *Transgender Medicine*, 2007 *supra* note 9 at 86.

⁴⁴ *Ibid.*

⁴⁵ *Ibid.*

⁴⁶ Gibson and Caitlin, *Urologic Nursing*, 2012 *supra* note 31 at 56; Istar Lev, *Transgender Emergence*, 2004 *supra* note 13 at 342.

Short form title

Pinpoints

- ▶ **Books, articles, etc:** “at 34” or “at 34–64” (no “page” or “p.”);
- ▶ **Legislation:** “s 34(10)(b)” or “ss 34–64”;
- ▶ **Jurisprudence:** “at para 34” or “at paras 34–64” - cite paragraphs, not pages, because the paragraphs are consistent across all reporters and databases;
- ▶ Non-consecutive pages or paragraphs: “34, 54, 64”;
- ▶ Consecutive pages or paragraphs: “34–64” - note that you use an en dash (–), **not a hyphen (-) or an em dash (—)**;
- ▶ If the source includes dashes in the numeration system, use something less confusing such as “to” - “34.1-1 to 34.1-8”;
- ▶ Do not abbreviate words which indicate portions of the text such as Appendix, Preamble, Schedule, Provision etc.

Abbreviations

Abbreviations also follow convention, and there are appendices in the *Guide* dealing with them

- ▶ Provinces: Appendix A-1 (Differs based on the material you are citing)
- ▶ US States: Appendix A-2
- ▶ Other jurisdictions: Appendices A-3 to A-5
- ▶ Courts and Tribunals: Appendix B
- ▶ Law Reporters: Appendix C
- ▶ Online Databases: Appendix E
- ▶ Law Journals: Appendix D
- ▶ Non-law journals: E-121

Legislation (*Guide* Chapter 2)

Legislation 1

Statutes:

- ▶ *Title*, Statute Volume and Jurisdiction Year, Chapter, (Session or supplement) Section Pinpoint.
 - ▶ *Personal Information Protection and Electronic Documents Act*, SC 2000, c 5.
 - ▶ *Criminal Code*, RSC 1985, c C-46, s 319.

Federal bills:

- ▶ Bill Number, Title, Session, Legislature, Year, Clause Pinpoint.
 - ▶ Bill C-32, *An Act to Amend the Copyright Act*, 2d Sess, 35th Parl, 1997, cl 15(1)(a).

Provincial bills:

- ▶ Bill Number, Title, Session, Legislature, Provincial Jurisdiction, Year, Clause Pinpoint.
 - ▶ Bill 139, *An Act to Make April 21 Climate Change Awareness Day*, 2d Sess, 38th Leg, Ontario, 2006, cl 3.

Legislation 2 - Regulations

Differ by jurisdiction. Consult the *Guide* for specific provinces.

- ▶ Federal regulations (revised): *Title*, CRC, chapter, pinpoint (year) (if applicable).
 - ▶ *Migratory Birds Regulations*, CRC, c 1035, s 4 (1978).
- ▶ Federal regulations (unrevised): *Title* (optional), SOR/year-regulation number, pinpoint.
 - ▶ *Canadian Aviation Security Regulations* SOR/2000-111, s 4.
- ▶ New Brunswick regulations: Jurisdiction Reg year-number, pinpoint.
 - ▶ NB Reg 84-20, Schedule 2(p).

Legislation 3

- ▶ *Civil Marriage Act*, RSC 2005, c. 33.
- ▶ *Criminal Code*, RSC 1985, c C-46, ss 272(1)(c), 273(1), 273.1, 273.2.
- ▶ *Family Services Act*, SNB 1980, c F-2.2, s 2 (CanLII).
- ▶ *Human Rights Act*, RSNB 2011, c171.
- ▶ *Human Rights Act*, RSNS 1989, c 214.
- ▶ *Human Rights Code*, RSO 1990, c H-19.
- ▶ *Medical Consent of Minors Act*, SNB 2002, c M-6.1 (CanLII).
- ▶ NB Reg 84-20, Schedule 2(p).
- ▶ *Vital Statistics Act*, RSNB 1979, c V-3 s 34(1)-(4).

Multiple similar
legislation from
different
jurisdictions

Can pinpoint multiple and non-
consecutive sections in legislation

Legislation 4

Notes on legislation:

- ▶ To cite the chapter, put a c followed by the exact chapter number as shown on the statute, including dashes, alphanumeric, and other characters.
- ▶ If citing legislation at a particular point in time, include “as it appeared on [day (optional) month year]”
 - ▶ *Family Services Act*, SNB 1980, c F-2.2, s 2 as it appeared on May 2001 (CanLII).
- ▶ The *Charter* is not an independent constitutional document, and so footnotes and references to it should instead refer to Part 1 of the *Constitution Act* 1982. A reference to s. 8 of the *Charter* would look like this:
 - ▶ *Canadian Charter of Rights and Freedoms*, s 8, Part I of the *Constitution Act*, 1982, being Schedule B to the *Canada Act 1982 (UK)*, 1982, c 11.

Jurisprudence (*Guide* Chapter 3)

Jurisprudence 1

General form:

- ▶ *Style of Cause* (Year of Decision if not otherwise indicated), Neutral Citation at Pinpoint, [Year of Reporter] Volume reporter (Series) (if applicable) Page, Parallel Citation (Court if not otherwise indicated) (database) [short form] (if applicable).
 - ▶ *R v Park*, [1995] 2 SCR 836.
 - ▶ *R v Sharpe*, 2001 SCC 2 at para 25, [2001] 1 SCR 45, 194 DLR (4th) 1 (QL) [Sharpe].
 - ▶ *R v Zhao*, 2013 ONCA 293, 297 CCC (3d) 533, 305 OAC 290 [Zhao] (CanLII).

Jurisprudence 2 – Style of Cause

- ▶ The case name – usually the last names of the parties involved.
 - ▶ Use last names only - no first names or middle initials. If there are multiple people on one side, only list the first name.
- ▶ French cases use c instead of v. Even when the case is being discussed in or translated into English;
- ▶ Remember - no periods used for abbreviations or initials;
- ▶ Always include the “Co” “Corp” “Inc” “Ltd” “LLP” when one of the parties is a corporate entity or partnership. Include which part of the government is involved if a province, country, or municipality is a party to the action - eg *Andrews v Alberta (AG)* or *Lodge v Fredericton (City of)*.

Jurisprudence 3 – Neutral Citation

- ▶ Always include the neutral citations **first** after the style of cause whenever available. Supreme Court cases since the early 2000s always have a neutral citation. Formulated as:
 - ▶ year Court Level decision number.
 - ▶ 2012 SCC 45 → this was the 45th case heard by the Supreme Court in 2012.
- ▶ This is a standardized citation format that gives the basic information/context of the case: year, court level, and decision number.
- ▶ Parallel citations will give information as to where the case can be found printed or online.

Jurisprudence 4 – Parallel Citation

- ▶ Parallel citations follow the neutral citation and cite case reporters or databases where the case can be found.
- ▶ Separate parallel citations with a comma.
- ▶ Place the pinpoint after the neutral citation. If the case does not have a neutral citation, place it after the source you **actually consulted**. Then include a parallel citation if applicable. These are almost always fully provided at the top of the page in online databases.
 - ▶ *Style of cause*, neutral citation at pinpoint, parallel citation.
 - ▶ *R v J(A)*, 2011 SCC 28 at para 14, [2011] 2 SCR 440.
- ▶ Case reporters divided by year use square brackets, and case reporters divided series use round brackets.
 - ▶ The Supreme Court Reporter goes by year, with about 3 volumes per year. They then start again at volume one for the next year.
 - ▶ *R v Sharpe* [2001] 1 SCR 45 → this is page 45 of the first volume of the 2001 Supreme Court Reports.
 - ▶ The Dominion law reporters are divided by series.
 - ▶ *R v Sharpe* (2001) 194 DLR (4th) 1 → page 1 in volume 194 of the 4th series.

Jurisprudence 5



SUPREME COURT OF CANADA

CITATION: Canada (Attorney General) v. Downtown Eastside Sex Workers United Against Violence Society, 2012 SCC 45 DATE: 20120921
DOCKET: 33981

BETWEEN:

Attorney General of Canada
Appellant
and

Downtown Eastside Sex Workers United Against Violence Society and Sheryl Kiselbach
Respondents
- and -

Attorney General of Ontario, Community Legal Assistance Society, British Columbia Civil Liberties Association, Ecojustice Canada, Coalition of West Coast Women's Legal Education and Action Fund (West Coast LEAF), Justice for Children and Youth,

ARCH Disability Law Centre, Conseil scolaire francophone de la Colombie-Britannique, David Asper Centre for Constitutional Rights, Canadian Civil Liberties Association, Canadian Association of Refugee Lawyers, Canadian Council for Refugees, Canadian HIV/AIDS Legal Network, HIV & AIDS Legal Clinic Ontario and
Positive Living Society of British Columbia
Interveners

CORAM: McLachlin C.J. and LeBel, Deschamps, Fish, Abella, Rothstein, Cromwell, Moldaver and Karakatsanis JJ.

REASONS FOR JUDGMENT: Cromwell J. (McLachlin C.J. and LeBel, Deschamps, Fish, Abella, Rothstein, Moldaver and Karakatsanis JJ. concurring)

2012 SCC 45 (CanLII)

Style of cause: *Canada (AG) v Downtown East Side Sex Workers United Against Violence Society*

Neutral citation: 2012 SCC 45

Jurisprudence 6



SUPREME COURT OF CANADA

Style of Cause: *AC v Manitoba (Director of Child and Family Services)*

CITATION: *A.C. v. Manitoba (Director of Child and Family Services)*, 2009 SCC 30, [2009] 2 S.C.R. 181

DATE: 20090626
DOCKET: 31955

BETWEEN:

A.C., A.C. and A.C.
Appellants
and
Director of Child and Family Services
Respondent
- and -
Attorney General of Manitoba, Attorney General of
British Columbia, Attorney General of Alberta
and Justice for Children and Youth
Interveners

Neutral citation: 2009 SCC 30

Parallel citation: [2009] 2 SCR 181

CORAM: McLachlin C.J. and Binnie, LeBel, Deschamps, Abella, Charron and Rothstein JJ.

REASONS FOR JUDGMENT: Abella J. (LeBel, Deschamps and Charron JJ. concurring)
(paras. 1 to 122)

CONCURRING REASONS: McLachlin C.J. (Rothstein J. concurring)
(paras. 123 to 161)

DISSENTING REASONS: Binnie J.
(paras. 162 to 239)

Many cases will have multiple parties on one or more side of the action. List only the **last name** of the **first party** listed for each side (or as in this case, their anonymized initials).

Jurisprudence 7

- ▶ **If the case does not have a neutral citation**, and the year and/or level of court is not clear from the law reporter name, be sure to indicate this. For example:
 - ▶ 50 NBLR 200 --- this is page 200 in the 50th volume of the New Brunswick Law Reports. The end of the citation should then include (QB) or (CA) or the like to indicate whether it is a Queen's Bench decision or a Court of Appeal one.
 - ▶ if the reporter indicates the jurisdiction (for example the New Brunswick Reports) then it isn't necessary to include the jurisdiction, only the level of court. For example (QB) or (CA).
 - ▶ Other common court divisions: BCCA, Ont Div Ct, Atla QB etc)
 - ▶ Place the year in brackets after the style of cause if alternate citations do not include the year.
- ▶ *Elliott v Parksville (City)* (1990), 66 DLR (4th) 107 (BCCA).
 - ▶ Note that because I cited the Dominion Law Reports and no other parallel citations here, I had to provide the year the case was heard in brackets after the style of cause and the level of court and jurisdiction at the end because the citation for the Dominion Law Reports doesn't rely on a date.
- ▶ There are standardized abbreviations for most law reports and case reporters included in the appendices of the *Guide*.

Jurisprudence 8 – General Notes

- ▶ **No superscript.** Series numbering should look like this: 2d, 3d, 4th, 5th, and so on.
- ▶ Place the comma after the style of cause (which includes the date in brackets if you must include it):
 - ▶ *Fisher v Fisher*, 2008 ONCA 11 at paras 52–59, 88 OR (3d) 241 [*Fisher*].
 - ▶ *R v Sharpe* (2001), 194 DLR (4th) 1.
 - ▶ *Gordon v Goertz*, [1996] 2 SCR 27 at para 13, 134 DLR (4th) 321 [*Gordon*].
- ▶ Cite the online database as the *last* of your parallel citations provided. The *Guide* Section 3.1 includes a “hierarchy of databases” which puts neutral citations at the top, print reporters in the middle, and online/other databases at the bottom in terms of “appropriate sources” (see s 3.8 of the *Guide*). Common **legal databases** are Quicklaw (QL) and Westlaw (WL Can). Cases are also commonly accessed for free of the Canadian Legal Information Institute (CanLII); there are also LII sites for most other jurisdictions.
- ▶ If **quoting a specific judge**, or if the judge's name is relevant to your argument, indicate the judge's name and/or whether the written decision they refer to was a majority, minority, or dissenting opinion - this is especially true for Supreme Court Cases.
 - ▶ *Little Sisters Book and Art Emporium v Canada (Minister of Justice)*, [2000] 2 SCR 1120, ACS no 66, Iacobucci, Arbour & LeBel JJ dissenting.
- ▶ In text, judges are referred to according to convention. General Judiciary: Gollightly J; Court of Appeal Justices: Gollightly JA; Court of Appeal Chief Justices: Golightly CJA; Supreme Court Chief Justices: Golightly CJC. If referring to more than one judge, then the plural is JJ: Gollightly and Varjak JJ

Jurisprudence 9

- ▶ *AC v Manitoba (Director of Child and Family Services)*, 2009 SCC 30, [2009] 2 SCR 181 (QL).
- ▶ *Edwards v Canada*, [1930] AC 124 (CanLII).
- ▶ *Little Sisters Book and Art Emporium v Canada (Minister of Justice)*, 2000 SCC 69, [2000] 2 SCR 1120 (QL).
- ▶ *Nixon v Rape Relief*, [2005] BCCA 601, 262 DLR 4th 360 [Nixon] (QL).
- ▶ *Nixon v Vancouver Rape Relief Society (cob Rape Relief and Women's Shelter)*, 2002 BCHRT 1, [2002] BCHRTD No 1 (QL).
- ▶ *R c Deschâtelets*, [2013] JQ 2220, 2013 QCCQ 1948.
- ▶ *R v Hutchinson*, 2014 SCC 19, [2014] 1 SCR 346.
- ▶ *R v J(A)*, 2011 SCC 28, [2011] 2 SCR 440.
- ▶ *R v Jobidon* [1991] 2 SCR 714.
- ▶ *R. v Morgentaler*, [1988] 1 SCR 30, [1988] 1 RCS 30 (QL).
- ▶ *R v Zhao*, 2013 ONCA 293, 297 CCC (3d) 533, 305 OAC 290.
- ▶ *Vancouver Rape Relief Society v Nixon*, [2003] BCJ No 2899, 2003 BCSC 1936 (QL).
- ▶ *XY v Ontario*, [2012] OHRTD No 175, 2012 HRTO 726, 74 CHRR D/2331 [XY] (QL).

French
citation

Government Documents (*Guide Chapter 4*)

Government Documents 1

Debates:

- ▶ Jurisdiction, Legislature, Title, Legislative Session, Volume or Number (Date) at Pinpoint (Speaker).
 - ▶ *House of Commons Debates*, 41st Parl, 1st Sess, No 107 (5 April 2012) (Megan Leslie).
 - ▶ Nova Scotia, *Legislative Assembly, Hansard*, 61st Leg, 4th Sess, (23 November 2012) at 4264 (Leonard Preya).
- ▶ If a specific bill or piece of legislation is being debated, begin the citation with the title in quotation marks, a comma, and the reading:
 - ▶ “Bill C-8, An Act to Amend the Copyright Act and the Trade-marks Act and to Make Consequential Amendments to Other Acts”, 2d reading, *House of Commons Debates*, 41st Parl, 2d sess, No 9 (28 October 2013) at 1504 (Hon Steven Blaney).

Government Documents 2

Sessional Papers

- ▶ Jurisdiction, Legislature, "title of report" by author in Title, number (year) at pinpoint.
 - ▶ Parliament, "Report of the Chief Inspector of Dominion Lands Agencies" by HG Cuttie in *Sessional Papers*, No 25 (1920) at 3.
 - ▶ Ontario, Legislative Assembly, "Report on Workmen's Compensation for Injuries" by James Mavor in *Sessional Papers*, No 40 (1900) at 6–7.

Reports published separately

- ▶ Jurisdiction, Legislature, Issuing body, Title (date) at pinpoint (Chair: Chair name).
 - ▶ House of Commons, Standing Committee on Justice and Human Rights, *An Act to amend the Canadian Human Rights Act and the Criminal Code (gender identity)* (20 November 2012) at 1640 (Chair: Dave McKenzie).

Government Documents 3

Non-Parliamentary papers:

- ▶ Jurisdiction, Issuing Body, Title, Volume/date/author (Publication Information) url if online pinpoint.
 - ▶ Office of the Privacy Commissioner of Canada, *Protecting Your Privacy on the Internet: Canada's New Privacy Laws* (Fact Sheet) (Ottawa: Office of the Privacy Commissioner of Canada, 2004).
 - ▶ Canadian Human Rights Act Review Panel, *Canadian Human Rights Act Review*, (Ottawa: Department of Justice, 2000) online: <publications.gc.ca/collections/Collection/J2-168-2000E.pdf>.
 - ▶ New Brunswick, Women's Issues Branch, *Equality Profile: Women in New Brunswick a Statistical Profile* (Fredericton: Women's Issues Branch, 2012) online: <www2.gnb.ca/content/dam/gnb/Departments/eco-bce/WI-DQF/pdf/en/EqualityProfile.pdf> at 14.
 - ▶ Statistics Canada, *Measuring Violence Against Women: Statistical Trends* by Maire Sinha, ed (Ottawa: 25 February 2013) online: <www.statcan.gc.ca/pub/85-002-x/2013001/article/11766-eng.pdf>.

Government Documents 4

Articles, Bulletins, short documents

- ▶ Jurisdiction, Issuing Body, "title", other information (if applicable) (publication information) at pinpoint.
 - ▶ New Brunswick, Human Rights Commission, "Guideline to Accommodating Physical and Mental Disabilities at Work", (fact sheet) (Fredericton: NBHRC, February 2014) online: <www.gnb.ca/hrc-cdp/e/g/Guideline-Accommodating-Disability-at-Work-New-Brunswick.pdf >.
 - ▶ Correctional Service of Canada, "Leisure Activities", Commissioner's Directive No 760 (Ottawa: CSC, 25 September 2008) at para 7.

Public Papers of Intergovernmental Conferences

- ▶ Name of Conference or Committee, Title, document number (location of conference: date of conference).
 - ▶ Meeting of the Continuing Committee of Ministers on the Constitution, *The Canadian Charter of Rights and Freedoms: Discussion Draft, July 4, 1980*, Doc 830-81/027 (Ottawa: 8–12 September 1980).

Government Documents 5

Reports of Inquiries and Commissions

- ▶ Jurisdiction, Issuing body, Title (publication information) volume (Chair) (if applicable) at pinpoint.
 - ▶ Canada, Commission of Inquiry into the Sponsorship Program and Advertising Activities, *Who is Responsible? Fact Finding Report* (Ottawa: Public Works and Government Services Canada, 2005) at 33.
- ▶ If reports in a series have different titles, the volume/date information should be placed directly after the title to indicate that they have been published under multiple titles:
 - ▶ *Report of the Royal Commission on Aboriginal Peoples: Looking Forward, Looking Back*, vol 1 (Ottawa: Supply and Services Canada, 1996).
 - ▶ *Report of the Royal Commission on Aboriginal Peoples: Restructuring the Relationship*, vol 2 (Ottawa: Supply and Services Canada, 1996) at 14.

Recap

Remember:

- No superscript;
- No periods for abbreviation;
- When indicating a span of pages or section numbers, **use the long en dash (—)** and neither a hyphen (-) nor an em dash (—). it is longer than a hyphen and shorter than the typical em dash.

International Materials (*Guide Chapter 5*)

International Materials 1 - Treaties

- ▶ *Treaty Name*, *Parties* (if applicable), *Date of Signature*, *Treaty Series Reference at Pinpoint* (*Date of Entry into Force and any other information*) [*short form/treaty series abbreviation* if applicable].
 - ▶ *Convention for the Protection of Human Rights and Fundamental Freedoms*, 4 November 1950, 213 UNTS 221 at 223 (entered into force 3 September 1953).
 - ▶ *North American Free Trade Agreement Between the Government of Canada, the Government of Mexico and the Government of the United States*, 17 December 1992, Can TS 1994 No 2 (entered into force 1 January 1994) [*NAFTA*].

Treaty series' abbreviations can be found on page E-91 of the *Guide*. For example:

- ▶ Air and Aviation Treaties of the World = AATW
- ▶ Canada Treaty Series = Can TS
- ▶ International Legal Materials = ILM
- ▶ United States Statutes at Large = US Stat

First Nations Treaties

- ▶ *Title*, *date* (if not in title), *online*: <[www.aadnc-aandc.gc.ca/full path](http://www.aadnc-aandc.gc.ca/full_path)> [*short form*].
 - ▶ *Treaty No 8 Made June 21, 1899*, *online*: <www.aadnc-aandc.gc.ca/eng/1100100028805/1100100028807>.

International Materials 2 – UN Documents

- ▶ UN documents vary widely, and you usually end up having to “build” your own citation by trying to find as much information as possible. A common basic formula is:
- ▶ *Author (if applicable), Title, UN Body Res or Dec Number, UN Body and OR, Session Number or Calendar Year, Supp Number, UN Doc Number (Calendar Year) First Page and at Pinpoint.*
 - ▶ *Universal Declaration of Human Rights, GA Res 217A (III), UNGAOR, 3rd Sess, Supp No 13, UN Doc A/810 (1948) 71 at 80.*
- ▶ The UN Charter can be cited as:
 - ▶ *Charter of the United Nations, 26 June 1945, Can TS 1945 No 7.*

International Materials 3 – UN Documents 2

Common words/phrases for UN docs and their abbreviations can be found on page E-92 of the *Guide*.

- ▶ Decision = Dec
- ▶ Document – Doc
- ▶ Mimeograph = Mimeo
- ▶ Plenary = Plen
- ▶ Supplement = Supp
- ▶ Economic and Social Council = EC
- ▶ General Assembly = GA
- ▶ Security Council = SC
- ▶ United Nations Conference on Trade and Development = UNCTAD

Meetings

- ▶ UN Body's Acronym and OR, session number or number of years since the body's inception, meeting, UN doc number (and sales number if applicable) (year of document) if applicable at pinpoint [provisional].
 - ▶ UNSCOR, 53rd Year, 3849th Mtg, UN Doc S/PV.3849 (1998) [provisional].
 - ▶ UNESCOR, 1984, 23rd Plen Mtg, UN Doc E/1984/SR.23.

International Materials 4 - UN Documents 3

Supplements Published in Official Records

- ▶ *Author (if applicable), Title, UN body Res or Dec number, UN body's acronym and OR, session number or calendar year, Supp no, UN Doc number (calendar year) 1st page at pinpoint.*
 - ▶ *Universal Declaration of Human Rights, GA Res 217a (III), UNGAOR, 3rd Sess, Supp No 13, UN Doc A/810 (1948) 71.*
 - ▶ *Commission on Crime Prevention and Criminal Justice, Report on the Ninth Session, UNESCO, 2000, Supp no 10, UN Doc E/2000/30.*
 - ▶ *Report of the UN Commissioner for Refugees, UNGAOR, 15th Sess, Supp No 11, UN Doc A/4378/Rev.1 (1960).*

International Materials 5 – UN Documents 4

Annexes

- ▶ *Title*, UN body's acronym and OR, session number or number of years since the body's inception, annex, agenda item no, UN Doc number (year) (if applicable) 1st page (if applicable) at pinpoint.
 - ▶ *Protectionism and Structural Adjustment*, UNCTAD TDBOR, 33rd Sess, Annex, Agenda Item 6, UN Doc TD/B/1081 (1986) at 23.

Periodicals

- ▶ Cite periodicals published by the UN the same as you would a journal article, but indicate UN and the body that published the material in parentheses at the end.
 - ▶ CP Romulo, "External Debt in Central America" (1987) CEPAL Review No 32 (UN, Economic Commission for Latin America and the Caribbean).

International Materials 6

World Trade Organization (WTO) and the General Agreement on Tariffs and Trade (GATT) Documents:

- ▶ GATT/WTO, *Title*, *Decision, Recommendation, or Document Number*, *Session number*, *BSID (year) first page online information* (if applicable).
 - ▶ GATT, *Report of the Panel adopted by the Committee on Anti-Dumping Practices on 30 October 1995*, GATT Doc ADP/137, 42nd Supp BSID (1995) 17.
 - ▶ WTO, *Report of the Working Party on the Accession of Bulgaria*, WTO Doc WT/ACC/BGR/5 (1996) online: WTO <docsonline.wto.org>.

International Materials 7

Other types of sources to watch out for and consult the Guide if unsure:

- ▶ International documents and reports of other international bodies such as the OECD, the European Union, etc.
- ▶ International courts such as the International Criminal Court, and the Inter-American Commission on Human Rights.
- ▶ Case law from other jurisdictions (such as the UK, Germany, Australia). They all have their own citation conventions and should be cited according to the rules of that jurisdiction.

Secondary Sources (*Guide* Chapter 6)

Secondary Sources 1 – Journal articles

General notes

- ▶ Authors are **last name first** in bibliographies (Hogg, Peter,), but **first name first** in the footnotes (Peter Hogg,).
- ▶ Write author names exactly as they appear on the materials, even if it creates inconsistency in citations.

Journal articles:

- ▶ **Author**, **"Title of Article"** (**Year**) **Volume:Issue** **abbreviated Journal Title** **First Page at pinpoint** (**Database Service, if applicable**).
 - ▶ Hogg, Peter, "The Charter Dialogue Between Courts and Legislatures" (2000) 20:3 Policy Options 19 at 24 (QL).
- ▶ Year: most journals are organized by volume, so most citations should have the year in rounded brackets following the title. However the year should appear in squared brackets for any journals organized by year rather than by volume.
 - ▶ Amber Chisholm, "Why Naps are Important" [1997] Yearly Rev Sleep Stud 45 at 50.

Secondary Sources 2 – Journal articles 2

Law Journal abbreviations

- ▶ Appendix D of the *McGill Guide* gives a list of abbreviated titles of law journals.
- ▶ The New York Law Journal is **NYLJ**, and the Ottawa Law Review is the **Ottawa L Rev**.
- ▶ If the title of a specific journal isn't listed in the guide, they provide a list of abbreviations for common elements at section 6.1.6 (page E-21). Always omit "of" and "the", and place no space between words which have been abbreviated to a single capital letter (Ex **UTLJ** and **JL Policy & Freedom**).
 - ▶ And = &
 - ▶ Association = Assoc
 - ▶ Bulletin = Bull
 - ▶ Canadian/Canada = Can
 - ▶ International = Intl
 - ▶ Law = L
 - ▶ Legal = Leg
 - ▶ Journal = J
 - ▶ Policy = Pol'y
 - ▶ Review = Rev
 - ▶ Quarterly = Q
 - ▶ University = U

Secondary Sources 3 – Journal articles 3

- ▶ David M Tanovich, “E-Racing Racial Profiling” (2004) 41 *Alta L Rev* 905 (QL).
- ▶ Brenna Bhandar, “Re-Covering The Limits Of Recognition: The Politics Of Difference And Decolonization In John Borrows’ *Recovering Canada: The Resurgence of Indigenous Law*” (2007) 27:1 *Austl Feminist LJ* 25 (Google Scholar).
- ▶ John Borrows, “Sovereignty’s Alchemy: An Analysis of *Delgamuukw v British Columbia*” (1999) 37 *Osgoode Hall LJ* 537 at 544.

Secondary Sources 4 - Books

- ▶ **Author(s)** (as name appears on title page), **Title** (,) **edition or volume number** (Place of publication: **Publisher**, **Year**) **at pinpoint print/e-book/electronic service**.
 - ▶ **LW Sumner**, *The Hateful and the Obscene: Studies in the Limits of Free Expression* (Toronto: University of Toronto Press, 2004) **print**.
 - ▶ **Daniel W Van Ness & Karen Heetderks Strong**, *Restoring Justice: An introduction to Restorative Justice*, 3d ed (Ohio: Anderson Publishing, 2006) **print**.

Halsbury's Laws of Canada (like an encyclopedia)

- ▶ **Halsbury's Laws of Canada**, **volume**, **subject matter** (publication information) **section update** (if applicable).
 - ▶ **Halsbury's Laws of Canada**, vol 2, *Business Corporations* (Markham, Ont: LexisNexis Canada, 2008) **at HBC-298 "Focus on Interests"** (Cum Supp Release 4).

Secondary Sources 5

Multiple authors If there is more than one author, list the first three using “&” in place of “and.” If there are more than three, list the first author followed by **et al.**

- ▶ Van Ness, Daniel W & Karen Heetderks Strong, *Restoring Justice: An introduction to Restorative Justice*, 3d ed (Ohio: Anderson Publishing, 2006) print.
- ▶ Bauer, Greta R **et al.** “Nonprescribed Hormone Use and Self-Performed Surgeries: “Do-It-Yourself” Transitions in Transgender Communities in Ontario.” *American Journal of Public Health* 103:10 (2013): 1830 online: <ajph.aphapublications.org/doi/pdf/10.2105/AJPH.2013.301348>.
- ▶ Note that in the above example the citation is for a bibliography as the **first** author only is listed last name first. In a footnote, they would appear as:
 - ▶ **Daniel W Van Ness & Karen Heetderks Strong**, *Restoring Justice: An introduction to Restorative Justice*, 3d ed (Ohio: Anderson Publishing, 2006) print.
 - ▶ **Greta R Bauer et al**, “Nonprescribed Hormone Use and Self-Performed Surgeries: “Do-It-Yourself” Transitions in Transgender Communities in Ontario” *American Journal of Public Health* 103:10 (2013): 1830 online: <ajph.aphapublications.org/doi/pdf/10.2105/AJPH.2013.301348>.

Secondary Sources 6

- ▶ For editors, list “ed” after the author name(s).
 - ▶ Fineman, Martha A, Jack E Jackson & Adam P Romero, *eds*, *Feminist and Queer Legal Theory: Intimate encounters, Uncomfortable Conversations* (Surrey, UK: Ashgate Publishing, 2009).
 - ▶ Sheehy, Elizabeth A, *ed*, *Sexual Assault in Canada: Law, Legal Practice and Women's Activism* (Ottawa: University of Ottawa Press, 2012).
- ▶ Essay in a collection or edition
 - ▶ *Author of essay*, “*Title of essay*” in *editor*, *ed*, *Title of book* (publication information) *First page of essay pinpoint*.
 - ▶ *Cowan, Sharon* “*Freedom and Capacity to Make a Choice: A Feminist Analysis of Consent in the Criminal Law of Rape*” in *Munro, Vanessa E & Carl F Stychin*, *eds*, *Sexuality and the Law: Feminist Engagements* (New York: Routledge-Cavendish, 2007) *51 at 54*.

Secondary Sources 7

- ▶ Borrows, John, *Recovering Canada: The Resurgence of Indigenous Law* (Toronto: University of Toronto Press, 2002) print.
- ▶ Butler, Judith, “Bodily Inscriptions, Performative Subversions,” [excerpt from *Gender Trouble* (1999)] in Warhol-Down and Herndl, eds, *Feminisms Redux* (2009), 465-476 ebook.
- ▶ Cowan, Sharon “Freedom and Capacity to Make a Choice: A Feminist Analysis of Consent in the Criminal Law of Rape” in Munro, Vanessa E & Carl F Stychin, eds, *Sexuality and the Law: Feminist Engagements* (New York: Routledge-Cavendish, 2007) at 51.
- ▶ Eisner, Shiri, *Bi Notes for a Bisexual Revolution* (California: Seal Press, 2013) print.
- ▶ King, Thomas, *The Inconvenient Indian: A Curious account of Native People in North America* (Toronto: Anchor Canada, 2013) print.
- ▶ Sampford, CJC et al, *Retrospectivity and the Rule of Law* (Oxford: Oxford University Press, 2006) print.

Secondary Sources 8 – Newspapers

- ▶ Author, "Title of Article", *Newspaper* (Date) Page (Database Service, if applicable) OR online: <URL>.
 - ▶ Marnie Luke & Lori Ward, "Inconsistent Radar Testing Casts Doubt on Validity Of Millions of Speeding Tickets", *CBC News* (25 January 2016), online: <www.cbc.ca/news/canada/speeding-tickets-police-radar-testing-1.3415927>.
 - ▶ Naomi Wolf, "Take the Shame Out of Rape", *The Guardian* (25 November 2005), online: <www.guardian.co.uk>.
 - ▶ "Cindy Gladue Case: Why the Not Guilty Verdict as Sparked Outrage", *CTV News* (2 April, 2015), online: <www.ctvnews.ca/canada/cindy-gladue-case-why-the-notguilty-verdict-has-sparked-outrage-1.2309102>.

On links:

- ▶ if there is an <https://> at the beginning of a url, include it. if it is simply <http://> (no "s"), **do not** include this and simply begin with "www." This is true of sources accessed through websites, online news articles, online journal articles etc....

Secondary Sources 9

Bibliography

Books

Cowan, Sharon "Freedom and Capacity to Make a Choice: A Feminist Analysis of Consent in the Criminal Law of Rape" in Munro, Vanessa E & Carl F Stychin, eds, *Sexuality and the Law: Feminist Engagements*. (New York: Routledge-Cavendish, 2007) at 51.

Desrosiers, Julie "Raising the Age of Sexual Consent: Renewing Legal Moralism?" in Sheehy, Elizabeth A, ed, *Sexual Assault in Canada: Law, Legal Practice and Women's Activism*. (Ottawa: University of Ottawa Press, 2012) 569.

Fineman, Martha A; Jackson, Jack E Jackson & Adam P Romero, eds, *Feminist and Queer Legal theory: Intimate encounters, Uncomfortable Conversations*. (Surrey, UK: Ashgate Publishing, 2009).

Jochelson, Richard & Kristen Kramer. *Sex & the Supreme Court: Obscenity and Indecency Laws In Canada*. (Halifax: Fernwood publishing, 2011).

Levine, Roslyn J "In Harm's Way: The Limits to Legislating Criminal Law" (2004) 24:2 Supreme Court Law Rev 195.

Sheehy, Elizabeth A, ed, *Sexual Assault in Canada: Law, Legal Practice and Women's Activism*. (Ottawa: University of Ottawa Press, 2012).

Sheehy, Elizabeth A, "Judges and the Reasonable Steps Requirement: The Judicial Stance on Perpetration Against Unconscious Women" in Sheehy, Elizabeth A, ed, *Sexual Assault in Canada: Law, Legal Practice and Women's Activism*. (Ottawa: University of Ottawa Press, 2012) 483.

Bibliography entries with their according footnotes

-
- ² Richard Jochelson & Kristen Kramer. *Sex & the Supreme Court: Obscenity and Indecency Laws In Canada*. (Halifax: Fernwood publishing, 2011).
- ³ Interview of C, sex worker (February 10th, 13th, 2015) via email; Interview of S, sex worker (February-March 2015, ongoing) via email.
- ⁴ *Ibid*, *Sex and the Supreme Court*, *supra* note 2 at 90.
- ⁵ Interview of C *supra* note 3.
- ⁶ *Ibid*; Interview of S *supra* note 3.
- ⁷ *Ibid*; Hilary Beaumont, "Canadian Law Isn't BDSM-Friendly" (December 19, 2014), *Vice* (blog), online: <http://www.vice.com/en_ca/read/the-uks-new-porn-censorship-laws-are-bad-but-canada-isnt-any-better-382>

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- ⁸ *R v Jobidon*, [1991] 2 SCR 714.
- ⁹ Roslyn J Levine "In Harm's Way: The Limits to Legislating Criminal Law" (2004) 24:2 Supreme Court Law Rev 195; Julie Desrosiers "Raising the Age of Sexual Consent: Renewing Legal Moralism?" in Elizabeth A Sheehy, ed, *Sexual Assault in Canada: Law, Legal Practice and Women's Activism*. (Ottawa: University of Ottawa Press, 2012) 569.
- ¹⁰ *Ibid*.
- ¹¹ *Jobidon*, *supra* note 8.
- ¹² *Ibid*.
- ¹³ *Welch*, *supra* note 1
- ¹⁴ *Ibid*.
- ¹⁵ *Ibid*, headnote.

-
- ³⁶ Sharon Cowan "Freedom and Capacity to Make a Choice: A Feminist Analysis of Consent in the Criminal Law of Rape" in Vanessa E Munro & Carl F Stychin, eds, *Sexuality and the Law: Feminist Engagements*. (New York: Routledge-Cavendish, 2007) at 51.
- ³⁷ *Criminal Code* s. 273.2 *supra* note 34; *Sexual Assault Handbook supra* note 32 at 12.
- ³⁸ Cowan *supra* note 36; *Ewanchuk supra* note 35; *Flaviano supra* note 35.
- ³⁹ Elizabeth A Sheehy, "Judges and the Reasonable Steps Requirement: The Judicial Stance on Perpetration Against Unconscious Women" in Elizabeth A Sheehy, ed, *Sexual Assault in Canada: Law, Legal Practice and Women's Activism*. (Ottawa: University of Ottawa Press, 2012) at 484.
- ⁴⁰ *Ewanchuk supra* note 35 at para 56.

Fin.