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**The Honourable David Lemetti & Nathalie G. Drouin Ad. E**  
Attorney General of Canada &  
Deputy Attorney General of Canada  
Atlantic Regional Office  
Department of Justice Canada  
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5251 Duke Street  
Halifax, NS B3J 1P3

Dear Attorney Generals and Deputy,

**Re: Dr. Ngola v. Her Majesty the Queen in right of the Province of New Brunswick and Canada (Royal Canadian Mounted Police)**  
**Our File No.: LS-L-0027-2020**

As per subsection 15(1) of the *Proceedings Against the Crown Act*, RSNB 1973, c. P-18, as it pertains to the Province, and pursuant to subsection 23(2) of the *Crown Liability and Proceedings Act*, RSC 1985, c. C-50, as it pertains to Canada, we enclose for prior notice and eventual service a draft Notice of Action with Statement of Claim Attached which sufficiently identifies the causes of action which we intend to bring against the named parties in the enclosed draft pleadings.

We are also providing you with notice of constitutional questions that will arise from the within anticipated litigation as it pertains namely to the validity of the Orders that have been issued under the *Emergency Measures Act* of New Brunswick. The within notice of constitutional question is provided

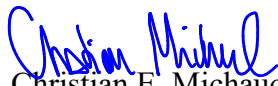
to you as both provincial and federal counterparts pursuant to subsection 22(3) of the *Judicature Act*, RSNB 1973 c. J-2.

We remain available at all times to provide further particulars as you may require to allow your respective Offices to appreciate and better ascertain the legal and constitutional issues at stake in the within matter. Given the requirement to provide the Province with at least a 60-day notice as per subsections 15(1) of the *Proceedings Against the Crown Act, supra*, we would welcome any out-of-court discussions to determine if this matter can be resolved amicably and to explore how best to ensure means for restorative justice for the Province of New Brunswick and its citizens given the gravity of the constitutional breaches at hand.

Trusting that you will find the above and the enclosed in order, we thank you for your prompt attention to this matter.

Yours very truly,

**LiberSolus**



Christian E. Michaud, Q.C.

CEM/mag

cc: Joël Étienne