

IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE COURT OF APPEAL OF QUEBEC)

BETWEEN:

ATTORNEY GENERAL OF NEWFOUNDLAND AND LABRADOR

APPELLANT
(Appellant)

and

UASHAUNNUAT (INNU OF UASHAT AND OF MANI-UTENAM), INNU OF
MATIMEKUSH-LAC JOHN, CHIEF GEORGES-ERNEST GRÉGOIRE, CHIEF RÉAL
MCKENZIE, INNU TAKUAIKAN UASHAT MAK MANI-UTENAM BAND, INNU NATION
MATIMEKUSH-LAC JOHN, MIKE MCKENZIE, YVES ROCK, JONATHAN MCKENZIE,
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FACTUM OF THE ATTORNEY GENERAL OF CANADA
Rules of the Supreme Court of Canada, SOR/2002-156, rule 37

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FACTUM OF THE ATTORNEY GENERAL OF CANADA**PART I: OVERVIEW AND FACTS****A. OVERVIEW**

1. Aboriginal rights recognized by s. 35 of the *Constitution Act, 1982* are *sui generis*. They stem from a legal culture distinct from the civil law or the common law. They are not correctly understood if conceived as personal, property, or real rights. To decide this appeal solely based on private interprovincial law rules,¹ which in Quebec rely essentially on the distinction between personal and real actions, would not respect the distinct and constitutionalized nature of s. 35 rights.
2. The inherent jurisdiction of superior courts to adjudicate constitutional rights should guide the assertion of jurisdiction over s. 35 rights when those rights affect another province. Canada therefore proposes that the Court adopt the following adaptation of the jurisdiction *simpliciter* test which accounts for the distinctiveness of s. 35 rights:
 - (a) Is there a real and substantial connection between the action as a whole and the jurisdiction in which the claim has been brought?
 - (b) Considering all the relevant circumstances, including the nature of declarations relating to s. 35 rights, should the superior court exercise jurisdiction over the relief sought regarding s. 35 rights of an Indigenous party as they affect another province?
3. That test is set out in more detail in section C of this factum.

¹ For the assistance of the reader, we will use “private interprovincial law” instead of “private international law”, as used in Book Ten of *Civil Code of Quebec*, CQLR, c. C-1991 (C.C.Q.).

B. FACTS

4. The respondents seek (1) damages and injunctive relief against interveners Iron Ore Company of Canada Inc. and the Quebec North Shore and Labrador Railway Company Inc. and (2) declarations relating to Aboriginal rights and title and Aboriginal treaty rights² over a territory known as Nitassinan, which straddles the border between Quebec and Labrador.³
5. Dismissing the Attorney General of Newfoundland and Labrador's motion to strike all allegations and conclusions relating to Newfoundland and Labrador, the Quebec Superior Court asserted jurisdiction over the respondents' action.⁴
6. The Quebec Court of Appeal held that (1) the respondents' mixed action is mainly an "*action personnelle de nature délictuelle*" over which Quebec courts have jurisdiction;⁵ (2) interjurisdictional immunity is not a preliminary bar to the action and should be dealt with at trial on the merits;⁶ and (3) the interests of justice command that the respondents present all the evidence in support of their allegations, including those relating to Labrador, in one forum being the Quebec Superior Court.⁷ The Court of Appeal did not consider whether the Superior Court should exercise its discretion to decline jurisdiction over the part of the respondents' action relating to Labrador.

PART II: OVERVIEW OF POSITION

7. Canada argues that the distinctiveness of s. 35 rights requires that superior courts decide whether to assert jurisdiction over s. 35 rights of an Indigenous party as they affect another province using the two-prong test set out in section C of this factum.

² Unless the context suggests otherwise, those rights will be referred to as "s. 35 rights".

³ Motion to Institute Proceedings, paras. 12, 44–53 (Appellant's Record (A.R.), vol. II at 5, 9–11).

⁴ 2016 QCCS 5133 (A.R., vol. I at 1–29).

⁵ 2017 QCCA 1791, paras. 61–96 (A.R., vol. I at 45–49).

⁶ 2017 QCCA 1791, paras. 97–108 (A.R., vol. I at 50–51).

⁷ 2017 QCCA 1791, paras. 109–120 (A.R., vol. I at 51–52).

PART III: ARGUMENT**A. TRADITIONAL PRIVATE INTERPROVINCIAL LAW RULES ARE INAPPOSITE**

8. Because of the distinctiveness of Aboriginal and treaty rights, civil or common law rules of property should be applied with caution.⁸ Aboriginal rights do not originate in the civil law or the common law.⁹ They derive from an occupation of the land which existed prior to the arrival of Europeans or current borders,¹⁰ and have not been created by either legislation or executive order.¹¹ Since 1982, they have received constitutional recognition.¹²
9. The definitions of Aboriginal rights and title reflect the distinctiveness of s. 35 rights, their *sui generis* and collective nature, and the fact that they cannot be correctly understood if conceived as personal, property, or real rights.
10. An Aboriginal right is an activity that is “an element of a practice, custom or tradition integral to the distinctive culture of the aboriginal group”.¹³
11. Aboriginal title confers collective “ownership rights” over lands, “including: the right to decide how the land will be used; the right of enjoyment and occupancy of the land; the right to possess the land; the right to the economic benefits of the land; and the right to pro-actively use and manage the land”.¹⁴ The collective nature of Aboriginal title confers an inherent limit in that the land cannot be used in a manner that is irreconcilable with the Aboriginal

⁸ *Tsilhqot'in Nation v. British Columbia*, [2014] 2 S.C.R. 257, 273, 293, paras. 14, 72; *Delgamuukw v. British Columbia*, [1997] 3 S.C.R. 1010, 1080–1091, paras. 111–130; *R. v. Sparrow*, [1990] 1 S.C.R. 1075, 1111–1112; *Guerin v. The Queen*, [1984] 2 S.C.R. 335, 382.

⁹ *Manitoba Metis Federation Inc. v. Canada (Attorney General)*, [2013] 1 S.C.R. 623, 659, para. 67.

¹⁰ See *Mitchell v. M.N.R.*, [2001] 1 S.C.R. 911, 934, 949–950, paras. 24, 55–56.

¹¹ *R. v. Sappier*; *R. v. Gray*, [2006] 2 S.C.R. 686, 712–713, para. 45; *Delgamuukw*, [1997] 3 S.C.R. 1010, 1082, 1088, paras. 114, 126; *R. v. Van der Peet*, [1996] 2 S.C.R. 507, 538–539, 547–548, paras. 30–31, 43–44; *Guerin*, [1984] 2 S.C.R. 335, 379.

¹² *Sparrow*, [1990] 1 S.C.R. 1075, 1105.

¹³ *R. v. Powley*, [2003] 2 S.C.R. 207, 221, para. 24; *Van der Peet*, [1996] 2 S.C.R. 507, 549, para. 46; *R. v. Adams*, [1996] 3 S.C.R. 101, 118, paras. 27–28.

¹⁴ *Tsilhqot'in Nation*, [2014] 2 S.C.R. 257, 275, 293, paras. 18, 73–74; see also *Delgamuukw*, [1997] 3 S.C.R. 1010, 1082, 1094–1095, paras. 114, 138–139.

right-holder’s attachment to the land.¹⁵ Aboriginal title does not include the right to alienate the land.¹⁶ It triggers a fiduciary duty on the Crown, an obligation on the Crown to seek consent of Aboriginal title holders before using or transferring it,¹⁷ and a burden on the government to “justify overriding the Aboriginal title-holding group’s wishes on the bases of the broader public good” if such consent cannot be obtained.¹⁸

12. Traditional private interprovincial law rules, which are based on the distinction between personal and real actions, do not account for the *sui generis* nature of s. 35 rights. It is true that in addition to interprovincial jurisdiction over personal actions¹⁹ and real actions,²⁰ Quebec courts may decide “mixed” actions. But as they are defined in civil law, mixed actions do not capture *sui generis* rights. They are either matters regarding succession or matrimonial or civil union regimes²¹ or matters with distinct personal and real components.²²
13. The superior courts’ inherent jurisdiction over constitutional rights provides an apposite legal basis for determining the issue of a given superior court’s jurisdiction over s. 35 rights of an Indigenous party as they affect another province.

B. IN APPROPRIATE CASES, SUPERIOR COURTS HAVE JURISDICTION TO DECIDE SECTION 35 RIGHTS OF AN INDIGENOUS PARTY AS THEY AFFECT ANOTHER PROVINCE

14. Absent an express statutory grant of jurisdiction, superior courts may rely on their inherent

¹⁵ *Delgamuukw*, [1997] 3 S.C.R. 1010, 1083, 1088–1089, paras. 117, 125–126.

¹⁶ *Delgamuukw*, [1997] 3 S.C.R. 1010, 1081–1082, para. 113; *Guerin*, [1984] 2 S.C.R. 335, 382.

¹⁷ *Tsilhqot’in Nation*, [2014] 2 S.C.R. 257, 292, 294, paras. 69, 74–76; *Guerin*, [1984] 2 S.C.R. 335, 382.

¹⁸ *Tsilhqot’in Nation*, [2014] 2 S.C.R. 257, 295, para. 77.

¹⁹ *C.C.Q.*, ss. 3148–3151.

²⁰ *C.C.Q.*, s. 3152.

²¹ *C.C.Q.*, ss. 3153–3154.

²² *CGAO v. Groupe Anderson inc.*, 2017 QCCA 923, paras. 10–11; *Bern v. Bern*, 1995 CanLII 4635, para. 24 (Qué. C.A.); Denys-Claude Lamontagne, *Biens et propriété*, 7th ed., Cowansville: Éditions Yvon Blais, 2013 at 63–66; Pierre-Claude Lafond, *Précis du droit des biens*, 2nd ed., Montréal: Thémis, 2007 at 178–180.

jurisdiction provided that they act in conformity with other constitutional rules and principles.²³

15. As the only courts of general jurisdiction, superior courts occupy “a position of prime importance in the constitutional pattern of this country”²⁴ and “provide for uniformity throughout the country in the judicial system”.²⁵ Even absent express statutory power, they have inherent jurisdiction over constitutional matters²⁶—which include s. 35 rights issues.
16. The superior courts’ inherent jurisdiction is not always limited by rules of territoriality. For example, a superior court may assess the constitutional validity of the statute of another province and make necessary findings of fact “where there is a real interest affected in [its] province”.²⁷ The provincial Crown’s immunity against suits before the superior court of a different province limits that inherent jurisdiction,²⁸ but the possibility of conflicting judgments, the avoidance of a multiplicity of proceedings, and the importance of access to justice—which is fundamental to the rule of law, itself “fostered by the continuing existence of the s. 96 courts”—may require courts to relax the rule in appropriate cases.²⁹

²³ See, e.g., *Endean v. British Columbia*, [2016] 2 S.C.R. 162, 177–178, paras. 23–24; *Ontario Criminal Lawyers’ Association of Ontario*, [2013] 3 S.C.R. 3, 16–19, paras. 17–26.

²⁴ *Attorney General of Canada v. Law Society of British Columbia*, [1982] 2 S.C.R. 307, 326–327; see also *MacMillan Bloedel Ltd. v. Simpson*, [1995] 4 S.C.R. 725, 753, para. 37; *Hunt v. T&N plc*, [1993] 4 S.C.R. 289, 311.

²⁵ *Reference re Young Offenders Act (P.E.I.)*, [1991] 1 S.C.R. 252, 264 (Lamer C.J.), reiterated in *MacMillan Bloedel Ltd.*, [1995] 4 S.C.R. 725, 740–741, para. 15; see also *Criminal Lawyers’ Association of Ontario*, [2013] 3 S.C.R. 3, 16, para. 17.

²⁶ *Canada (Human Rights Commission) v. Canadian Liberty Net*, [1998] 1 S.C.R. 626, 653–654, paras. 28–29.

²⁷ *Hunt*, [1993] 4 S.C.R. 289, 310–311, 315.

²⁸ See, for example, *Medvid v. Alberta (Health and Wellness)*, 2012 SKCA 49, paras. 18–20; *Athabasca Chipewyan First Nation v. British Columbia*, 2001 ABCA 112, paras. 23–43; *Sauve v. Quebec (Attorney General)*, 2011 ONCA 369, paras. 2–3.

²⁹ *Trial Lawyers Association of British Columbia v. British Columbia*, [2014] 3 S.C.R. 31, 51, para. 39; see also Peter W. Hogg et al., *Liability of the Crown*, 4th ed., Toronto: Carswell, 2011, at 485–488; Janet Walker, “Interprovincial Sovereign Immunity Revisited” (1997), 35 *Osgoode Hall L.J.* 379, 389.

17. The purposive and discretionary nature of constitutional remedies³⁰ and of declaratory relief may also guide superior courts in deciding whether they should exercise jurisdiction taking into account all competing considerations. The s. 35 declaration sought may lack practical effect,³¹ either because it would not be binding on the other jurisdiction or because determination of s. 35 rights is not essential for the determination of the action as a whole.
18. Such an approach is in keeping with the more flexible view this Court has adopted towards extraterritorial application of statutes³² and adopts principles that are fully respectful of s. 35 rights.

C. A TEST THAT ACCOUNTS FOR THE DISTINCTIVENESS OF SECTION 35 RIGHTS

19. The jurisdiction *simpliciter* analysis alone fails to address all the competing considerations involved in a superior court’s decision whether to dismiss at an early stage an action involving s. 35 rights of an Indigenous party as they affect another province. The following two-step framework will enable courts to decide the issue raised in this appeal with flexibility yet comprehensively in both “private” and “public” law actions:³³
- (a) Is there a real and substantial connection between the action as a whole and the jurisdiction in which the claim has been brought?

³⁰ See, e.g., *Canada (Attorney General) v. PHS Community Services Society*, [2011] 3 S.C.R. 134, 190–192, paras. 142–152; *Khadr v. Canada (Prime Minister)*, [2010] 1 S.C.R. 44, 61–67, paras. 30–67; *Okwuobi v. Lester B. Pearson School Board*, [2005] 1 S.C.R. 257, 284–285, paras. 54–55; *Reza v. Canada*, [1994] 2 S.C.R. 394, 403–405; *Schachter v. Canada*, [1992] 2 S.C.R. 679, 695–696; *Reference re: Language Rights in Manitoba*, [1985] 1 S.C.R. 721, 752–769.

³¹ *Ewert v. Canada*, [2018] 2 S.C.R. 165, 205–206, paras. 81–83; *Daniels v. Canada (Indian Affairs and Northern Development)*, [2016] 1 S.C.R. 99, 110, 126–128, paras. 11, 53–57.

³² See, e.g., *Unifund Assurance Co. v. Insurance Corp. of British Columbia*, [2003] 2 S.C.R. 63, 88–90, 92–95, 99, paras. 51, 54–58, 63–71, 80.

³³ See, e.g., *Haaretz.com v. Goldhar*, [2018] 2 S.C.R. 3, 27–29, 33–36, paras. 27–32, 43, 46–47; *Lapointe Rosenstein Marchand Melançon LLP v. Cassels Brock & Blackwell LLP*, [2016] 1 S.C.R. 851; *Infineon Technologies AG v. Options consommateurs*, [2013] 3 S.C.R. 600; *Club Resorts Ltd. v. Van Breda*, [2012] 1 S.C.R. 572.

- (b) Considering all the relevant circumstances, including the nature of declarations relating to s. 35 rights, should the superior court exercise jurisdiction over the relief sought regarding s. 35 rights of an Indigenous party as they affect another province?
20. The answer to question (a) will depend on the ordinary rules of jurisdiction,³⁴ which prevent courts “from unduly entering in matters in which the jurisdiction in which it is located has little interest”,³⁵ keeping in mind that the “guiding element in the determination of an appropriate forum must be principles of order and fairness”.³⁶ Under s. 3148 of the *C.C.Q.*, Quebec courts would have interprovincial jurisdiction provided that, for example, the defendant is domiciled in Quebec, the fault was committed in Quebec or the injury was suffered in Quebec.
21. The answer to question (b) will depend not only on the *forum non conveniens* analysis,³⁷ but also on factors addressing the distinctiveness of s. 35 rights: the ability of other courts to decide competing or overlapping assertions of s. 35 rights;³⁸ the distinctiveness of s. 35 rights, which sometimes straddle provincial boundaries, and the difficulty of limiting their assessment to the territory of the province in which the action was filed; the specificity of Aboriginal rights, which may be site-specific;³⁹ the scope of Aboriginal title, which includes not only “specific sites of settlement but [also] extends to tracts of land that were regularly used for hunting, fishing or otherwise exploiting resources and over which the group

³⁴ See, e.g., *C.C.Q.*, ss. 3134, 3148; *Haaretz.com*, [2018] 2 S.C.R. 3, 27–29, paras. 27–31; *Club Resorts Ltd.*, [2012] 1 S.C.R. 572, 618, para. 90; *Spar Aerospace Ltd. v. American Mobile Satellite Corp.*, [2002] 4 S.C.R. 205, 230–234, paras. 51–57, 90.

³⁵ *Tolofson v. Jensen*, [1994] 3 S.C.R. 1022, 1049; see also *Haaretz.com*, [2018] 2 S.C.R. 3, 28–29, para. 30.

³⁶ *Hunt*, [1993] 4 S.C.R. 289, 313, discussing *Morguard Investments Ltd. v. De Savoye*, [1990] 3 S.C.R. 1077, 1103.

³⁷ *C.C.Q.*, s. 3135; *Spar Aerospace Ltd.*, [2002] 4 S.C.R. 205, 239, para. 71.

³⁸ See, in a different context, *Teck Cominco Metals Ltd. v. Lloyd’s Underwriters*, [2009] 1 S.C.R. 321, 332–335, paras. 25–31.

³⁹ *Lax Kw’alaams Indian Band v. Canada (Attorney General)*, [2011] 3 S.C.R. 535, 558–559, para. 46; *R. v. Marshall*, [2005] 2 S.C.R. 220, 240–241, para. 38; *Delagamuukw*, [1997] 3 S.C.R. 1010, 1093–1095, paras. 137–139; *R. v. Côté*, [1996] 3 S.C.R. 139, 167, para. 39; *Adams*, [1996] 3 S.C.R. 101, 116–119, paras. 25–27, 30.

exercised effective control at the time of assertion of European sovereignty”;⁴⁰ and the interest of the Crown of another province in participating in litigation, *e.g.* to present evidence and argument as to the scope of s. 35 rights, and the non-compellability of the provincial Crown before the superior court of another province.

PART IV: COSTS

22. The Attorney General of Canada does not seek costs and requests that no costs be ordered against him.

PART V: ORDER SOUGHT

23. The Attorney General of Canada asks that the Court render a decision consistent with these submissions.

PART VI: CONFIDENTIALITY ORDER

24. No confidentiality order was made in relation to this appeal.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Montréal (Quebec), this 10th day of April 2019.



Ian Demers
Counsel for the Attorney General of Canada

⁴⁰ *Tsilhqot'in Nation*, [2014] 2 S.C.R. 257, 286, para. 50.

PART VII: AUTHORITIES

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1.	<i>Manitoba Metis Federation Inc. v. Canada (Attorney General)</i>, [2013] 1 S.C.R., 623	8
2.	<i>R. v. Sappier; R. v. Gray</i>, [2006] 2 S.C.R. 686	8
3.	<i>Mitchell v. M.N.R.</i>, [2001] 1 S.C.R. 911	8
4.	<i>R. v. Sparrow</i>, [1990] 1 S.C.R. 1075	8
5.	<i>R. v. Van der Peet</i>, [1996] 2 S.C.R. 507	8, 9
6.	<i>Guerin v. The Queen</i>, [1984] 2 S.C.R. 335	8, 11
7.	<i>Tsilhqot'in Nation v. British Columbia</i>, [2014] 2 S.C.R. 257	8, 10, 11, 18, 21
8.	<i>Delgamuukw v. British Columbia</i>, [1997] 3 S.C.R. 1010	8, 10, 11, 21
9.	<i>R. v. Powley</i>, [2003] 2 S.C.R. 207	9
10.	<i>R. v. Adams</i>, [1996] 3 S.C.R. 101	9, 21
11.	<i>CGAO v. Groupe Anderson inc.</i>, 2017 QCCA 923	12
12.	<i>Bern v. Bern</i>, 1995 CanLII 4635	12
13.	<i>Endean v. British Columbia</i>, [2016] 2 S.C.R. 162	14
14.	<i>Ontario v. Criminal Lawyers' Association of Ontario</i>, [2013] 3 S.C.R. 3	14, 15
15.	<i>Attorney General of Canada v. Law Society of British Columbia</i>, [1982] 2 S.C.R. 307	15
16.	<i>MacMillan Bloedel Ltd. v. Simpson</i>, [1995] 4 S.C.R. 725	15
17.	<i>Reference re Young Offenders Act (P.E.I.)</i>, [1991] 1 S.C.R. 252	15
18.	<i>Canada (Human Rights Commission) v. Canadian Liberty Net</i>, [1998], 1 S.C.R. 626	15
19.	<i>Hunt v. T&N plc</i>, [1993] 4 S.C.R. 289	15, 16, 20

<i>Case Law</i>		Cited at para
20.	<i>Medvid v. Alberta (Health and Wellness)</i>, 2012 SKCA 49	16
21.	<i>Athabasca Chipewyan First Nation v. British Columbia</i>, 2001 ABCA 112	16
22.	<i>Sauve v. Quebec (Attorney General)</i>, 2011 ONCA 369	16
23.	<i>Trial Lawyers Association of British Columbia v. British Columbia</i>, [2014] 3 S.C.R. 31	16
24.	<i>Daniels v. Canada (Indian Affairs and Northern Development)</i>, [2016] 1 S.C.R. 99	17
25.	<i>Canada (Attorney General) v. PHS Community Services Society</i>, [2011] 3 S.C.R. 134	17
26.	<i>Khadr v. Canada (Prime Minister)</i>, [2010] 1 S.C.R. 44	17
27.	<i>Okwuobi v. Lester B. Pearson School Board</i>, [2005] 1 S.C.R. 257	17
28.	<i>Reza v. Canada</i>, [1994] 2 S.C.R. 394	17
29.	<i>Schachter v. Canada</i>, [1992] 2 S.C.R. 679	17
30.	<i>Reference re: Language Rights in Manitoba</i>, [1985] 1 S.C.R. 721	17
31.	<i>Ewert v. Canada</i>, [2018] 2 S.C.R., 165	17
32.	<i>Unifund Assurance Co. v. Insurance Corp. of British Columbia</i> [2003] 2 S.C.R. 63	18
33.	<i>Lapointe Rosenstein Marchand Melançon LLP v. Cassels Brock & Blackwell LLP</i>, [2016] 1 S.C.R. 851	19
34.	<i>Infineon Technologies AG v. Options consommateurs</i>, [2013] 3 S.C.R. 600	19
35.	<i>Haaretz.com v. Goldhar</i>, [2018] 2 S.C.R. 3	19, 20
36.	<i>Club Resorts Ltd. v. Van Breda</i>, [2012] 1 S.C.R. 572	19, 20
37.	<i>Spar Aerospace Ltd. v. American Mobile Satellite Corp.</i>, [2012] 4 S.C.R. 205	20, 21
38.	<i>Tolofson v. Jensen</i>, [1994] 3 S.C.R. 1022	20

Case Law		Cited at para	
39.	Morguard Investments Ltd. v. De Savoye, [1990] 3 S.C.R. 1077	20	
40.	Teck Cominco Metals Ltd. v. Lloyd's Underwriters, [2009] 1 S.C.R. 321	21	
41.	Lax Kw'alaams Indian Band v. Canada (Attorney General), [2011] 3 S.C.R. 535	21	
42.	R. v. Marshall, [2005] 2 S.C.R. 220	21	
43.	R. v. Côté, [1996] 3 S.C.R. 139	21	
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44.	Denys-Claude Lamontagne, <i>Biens et propriété</i> , 7 th ed., Cowansville: Éditions Yvon Blais, 2013	12	
45.	Pierre-Claude Lafond, <i>Précis du droit des biens</i> , 2 nd ed., Montréal: Thémis, 2007	12	
46.	Janet Walker, "Interprovincial Sovereign Immunity Revisited" (1997), 35 Osgoode Hall L.J. 379, 389	16	
47.	Peter W. Hogg et al., <i>Liability of the Crown</i> , 4 th ed., Toronto: Carswell, 2011	16	
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48.	Constitution Act, 1982, s. 35	Loi constitutionnelle de 1982, art. 35	Passim
49.	Civil Code of Québec, CQLR, c. C-1991, s. 3148-3151	Code civil du Québec, RQLR, ch. C-1991, art. 3148-3151	12, 20
50.	Civil Code of Québec, CQLR, c. C-1991, s. 3152	Code civil du Québec, RQLR, ch. C-1991, art. 3152	12
51.	Civil Code of Québec, CQLR, c. C-1991, s. 3153-3154	Code civil du Québec, RQLR, ch. C-1991, art. 3153-3154	12
52.	Civil Code of Québec, CQLR, c. C-1991, s. 3134	Code civil du Québec, RQLR, ch. C-1991, art. 3134	20
	Civil Code of Québec, CQLR, c. C-1991, s. 3148	Code civil du Québec, RQLR, ch. C-1991, art. 3148	20
	Civil Code of Québec, CQLR, c. C-1991, s. 3135	Code civil du Québec, RQLR, ch. C-1991, art. 3135	21