

ONTARIO

SUPERIOR COURT OF JUSTICE

(COMMERCIAL LIST)

BETWEEN:

**IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF LAURENTIAN UNIVERSITY OF SUDBURY**

Applicant

**RESPONDING APPLICATION RECORD
OF THE CANADIAN UNION OF PUBLIC EMPLOYEES**

March 5, 2021

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Canadian Union of Public
Employees

TO: SEE ATTACHED SERVICE LIST

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**RESPONDING APPLICATION RECORD
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**AFFIDAVIT OF KAREN DUCHARME
(sworn March 5, 2021)**

I, **Karen Ducharme**, in the City of Ottawa, in the Province of Ontario, **MAKE OATH
AND SAY THAT:**

1. I have personal knowledge of the facts and matters herein deposed to by me, except where same are stated to be based upon information and belief, in which case I believe them to be true.

2. I am a Secretary for the Canadian Union of Public Employees, working out of the Ottawa Area Office.
3. The Canadian Union of Public Employees ("CUPE") represents a total of over 300 employees working at Laurentian University of Sudbury ("Laurentian"), who are members of CUPE locals, being Local 895-04 (sessional instructors at Thornloe University, an affiliate of Laurentian); and Local 894-05 (food service employees); and Local 5011 (teaching assistants).
4. More broadly, in the post-secondary sector, CUPE represents approximately 38,600 employees at Ontario public universities. A table setting out the number and type of members, their bargaining unit name and name of employer at Ontario universities is attached at Exhibit "A"
5. CUPE members in academic positions at Ontario universities include teaching assistants, research assistants, graduate student academic employees, lab technicians, contract academic staff (teachers), postdoctoral fellows and librarians.
6. CUPE members in academic support services include administrative staff (clerical, clerks), custodians, food service, cooks, building services, maintenance, skilled trades (locksmiths, elevator maintenance, painters, carpenters, plumbers, electricians, etc.), grounds maintenance (garbage, snow removal, digging, gardening), electrical services, heating plant operators.
7. I swear this affidavit in order to assist the court in determining the matters in issue in these proceedings, and for no other or improper purpose.

SWORN in the City of OTTAWA, in the
Province of Ontario, this 5th day of March,
2021,.

Affidavits

K. Ducharme

Karen Ducharme

This is **Exhibit "A"** referred to in the Affidavit of
KAREN DUCHARME, sworn this 5th day of March,
2021, in Ottawa, Ontario

A handwritten signature in dark ink, consisting of stylized, overlapping loops and curves, positioned above a horizontal line.

A Commissioner for taking Affidavit, etc.

CUPE POST-SECONDARY SECTOR MEMBERSHIP BREAKDOWN

UNIVERSITY	SUB SECTOR	UNIT NAME	MEMBERS (BASED ON MOST RECENT DATA)
Brock University	Maintenance, Custodial, Technical, Grounds, Trades	1295-00	260
Brock University	Maintenance, Custodial, Technical, Grounds, Trades	2220-02	2
Brock University	PSE, Maintenance, Custodial, Technical, Grounds, Trades	1295-02	150
Brock University	Sessional Instructors	4207-02	100
Brock University	Sessional Instructors	4207-03	200
Brock University	Teaching Assistants, Graduate Assistants, Sessional Instructors	4207-01	1035
Carleton University	Administration	2424-01	850
Carleton University	Maintenance, Custodial, Technical, Grounds, Trades	910-01	44
Carleton University	Maintenance, Custodial, Technical, Grounds, Trades	3778-00	6
Carleton University	Sessional Instructors	4600-02	1000
Carleton University	Teaching Assistants	4600-01	1800
Lakehead University	Teaching Assistants , Graduate Assistants, Research Assistants	3905-01	400
Laurentian University	Sessional Instructors	895-04	18
Laurentian University	Teaching Assistants	5011	236
McMaster University	Postdoctoral Fellows	3906-03	190
McMaster University	Sessional Instructors	3906-02	450
McMaster University	Teaching Assistants	3906-01	2010
Queen's University	Library	1302-00	55
Queen's University	Maintenance, Custodial, Technical, Grounds, Trades	229	465
Queen's University	Technicians	254-00	98

Affidavit Exhibit B

UNIVERSITY	SUB SECTOR	UNIT NAME	MEMBERS (BASED ON MOST RECENT DATA)
Ryerson University	Maintenance, Custodial, Technical, Grounds, Trades	233	120
Ryerson University	Sessional Instructors	3904-01	2460
Ryerson University	Sessional Instructors	3904-02	1000
Ryerson University	Teaching Assistants	3904-03	1400
Trent University	Sessional Instructors	3908-01	300
Trent University	Teaching Assistants	3908-02	300
University of Guelph	Graduate Assistants	3913-01	2125
University of Guelph	Library	1334-01	5
University of Guelph	Maintenance, Custodial, Technical, Grounds, Trades	1334-00	241
University of Guelph	Sessional Instructors	3913-02	192
University of Ottawa	Housing	2626-03	98
University of Ottawa	PSE	2626-01	37
University of Ottawa	Sessional Instructors	2626-02	28
University of Ottawa	Teaching Assistants, Research Assistants	2626-00	3200
University of Toronto	Childcare	2484-08	35
University of Toronto	Food Services	3261-06	125
University of Toronto	Library	1230-01	412
University of Toronto	Library	1230-02	100
University of Toronto	Maintenance, Custodial, Technical, Grounds, Trades	3261-00	,965
University of Toronto	Maintenance, Custodial, Technical, Grounds, Trades	3261-01	270
University of Toronto	Postdoctoral Fellows	3902-05	1000
University of Toronto	Sessional Instructors	3902-03	3000
University of Toronto	Teaching Assistants	3902-01	5000
University of Toronto	Teaching Assistants	3902-02	50
University of Toronto	Teaching Assistants, Graduate Assistants	3907-00	235

Affidavit Exhibit B

UNIVERSITY	SUB SECTOR	UNIT NAME	MEMBERS (BASED ON MOST RECENT DATA)
University of Toronto	Teaching Assistants, Graduate Assistants, Research Assistants, Sessional Instructors	3902-04	40
University of Waterloo	Food Services, Maintenance, Custodial, Technical, Grounds, Trades	793-01	458
University of Windsor	Food Services, Maintenance, Custodial, Technical, Grounds, Trades	1001-00	224
University of Windsor	Maintenance, Custodial, Technical, Grounds, Trades	1393-00	254
University of Windsor	Teaching Assistants, Graduate Assistants, Research Assistants	4580-00	1400
Western University	Food Services	2692-00	600
Western University	Maintenance, Custodial, Technical, Grounds, Trades	2361-00	300
Western University	Sessional Instructors	5265-00	102
Wilfrid Laurier	Maintenance, Custodial, Technical, Grounds, Trades	926-01	100
York University	Graduate Assistants	3903-03	50
York University	Library	3903-04	15
York University	Maintenance, Custodial, Technical, Grounds, Trades	1356-00	300
York University	Security	1356-01	100
York University	Security	1356-02	71
York University	Sessional Instructors	3903-02	790
York University	Teaching Assistants	3903-01	1750

Court File No. CV-21-656040-00CL

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**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED**

Court File No. CV-21-656040-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT
OF LAURENTIAN UNIVERSITY OF SUDBURY**

ONTARIO

SUPERIOR COURT OF JUSTICE

Proceeding commenced at Toronto

**RESPONDING APPLICATION
RECORD OF
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