

**UNOFFICIAL TRANSLATION OF
THE AFFIDAVIT OF CAROL JOLIN
SWORN ON MARCH 31, 2021**

COURT FILE NO.: CV-21-656040-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
RSC 1985, c C-36

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

**AFFIDAVIT OF CAROL JOLIN
(March 31, 2021)**

I the undersigned, CAROL JOLIN, of the city of Ottawa, in the county of Carleton,
AFFIRM that:

1. I was elected president of the Assemblée de la francophonie de l'Ontario (the "**AFO**") in 2016.
2. I have personal knowledge of the facts set out in this affidavit, except where they are otherwise stated to be based on information or belief.
3. The AFO is the umbrella organization and political voice of Franco-Ontarians. Its mandate is to consult with and speak on behalf of Ontario's Francophone community. The AFO's members include 152 associations and 23 institutions. Its individual members include LU students and faculty, and parents who are rights holders under section 23 of the *Charter*. The AFO promotes and defends the rights and interests of more than 744,000 Franco-Ontarians. The AFO focuses primarily on seven issues of great importance to Franco-Ontarians: education, language rights, arts and culture, employability, immigration, health, and communications.
4. French is the working language and the language of communication of the AFO, as set out in article 1.9 of its bylaws.
5. The restructuring of Laurentian University ("**LU**") is already harming French Ontario and having a disproportionately negative impact on many Franco-Ontarians.
6. LU is the second largest of the few universities that offer post-secondary education in French in Ontario; it is much larger than the third largest, and is by far the largest in Mid-Northern and Northern Ontario.

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7. Some 20 publicly funded universities across the province offer a full range of quality English-language programs, courses and services.
8. The AFO is concerned about what will happen to the thousands of students who do not know whether they will be able to complete their studies in French at LU, or have been admitted to LU and do not know whether LU will continue to offer the program to which they have been admitted. LU educates a significant portion of the future pool of employees able to work in French, not only in Mid-Northern and Northern Ontario, but also in other parts of the province, and the AFO is also concerned for the employers who depend on the workforce educated in French at LU.
9. In an open letter dated March 10, 2021, faculty who closely follow Franco-Ontarian community issues expressed their support for the AFO's participation in the LU restructuring process, notably because LU is not in a position to represent the Franco-Ontarian community and assert its rights. Attached to this affidavit as **Exhibit CJ-1** is a true copy of this open letter, accessible at the following link: <https://www.lavoixdunord.ca/opinions/lafo-devrait-representer-la-francophonie-ontarienne-dans-le-dossier-de-luniversite-laurentienne-1fb2c6f12c37f26f0bdf3105e209df3b?sourceOrganizationKey=le-voyageur>.
10. The proceeding initiated by LU under the *Companies' Creditors Arrangement Act* (the "CCAA") is being conducted almost exclusively in English, and the orders are available in English only. I have consulted the information on the monitor's website relating to this proceeding and the documents are available in English only, even on the French version of the site. The only document available in French is the *Notice to Creditors* (dated February 2, 2021). The portion of the monitor's website relating to these proceedings is accessible at the following link: <https://documentcentre.ey.com/#/detail-engmt?eid=459>. No details are provided on either the monitor's website or LU's website as to how the status and use of French will be affected.
11. On Friday, March 12, 2021, I participated in the AFO's *Table de concertation du Nord* [Northern roundtable]. At that event, some 60 actors and organizations representing the Francophone community of Sudbury and Northern Ontario developed a plan to advocate for a university "by" and "for" Francophones. The President and Vice-Chancellor of the University of Sudbury, John Meehan, was there. Attached to this affidavit as **Exhibit CJ-2** is a true copy of an article dated March 15, 2021 about this roundtable, accessible at the following link: <https://www.lavoixdunord.ca/actualites/education/les-francophones-du-moyen-nord-se-preparent-a-imaginer-et-revendiquer-leur-universite-0bb389e2ee1495e19fc9beda26c153b4>.
12. On Friday, March 12, 2021, I participated in a joint press conference with the University of Sudbury at which I publicly announced that the AFO supports the

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University of Sudbury's decision to become a university "by" and "for" Francophones.

13. On March 15, 2021, I sent a letter on behalf of the AFO to the President and Vice-Chancellor of LU, Dr. Robert Haché (hereinafter "**President Haché**"), and to the Chair of the Board of Governors of LU, M^e Claude F. Lacroix, inviting them to meet with the AFO outside the CCAA proceedings to discuss possible avenues relating to course, program and service offerings at LU and the University of Sudbury. Attached to this affidavit as **Exhibit CJ-3** is a true copy of this letter.
14. On March 19, 2021, I received a response from President Haché stating that due to the CCAA proceeding, LU "*cannot* comment on developments in this process nor engage in discussions outside this process regarding its academic programs or its relationship with its federated partners" [emphasis added]. Attached to this affidavit as **Exhibit CJ-4** is a true copy of this letter.

Sworn remotely by Carol Jolin in the city
of Ottawa in the province of Ontario,
before me in the city of Montréal in the
province of Québec, on March 31, 2021,
in accordance with O. Reg. 431/20
*Administering Oath or Declaration
Remotely.*

CAROL JOLIN