



No. S090663  
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

Between:

CAMBIE SURGERIES CORPORATION, CHRIS CHIAVATTI, MANDY  
MARTENS, KRYSTIANA CORRADO, WALID KHALFALLAH by his litigation  
guardian DEBBIE WAITKUS, and SPECIALIST REFERRAL CLINIC  
(VANCOUVER) INC.

Plaintiffs

And:

MEDICAL SERVICES COMMISSION OF BRITISH COLUMBIA, MINISTER  
OF HEALTH OF BRITISH COLUMBIA, and ATTORNEY GENERAL OF  
BRITISH COLUMBIA

Defendants

And:

DR. DUNCAN ETCHES, DR. ROBERT WOOLLARD, GYLN TOWNSON,  
THOMAS MCGREGOR, BRITISH COLUMBIA FRIENDS OF MEDICARE  
SOCIETY, CANADIAN DOCTORS FOR MEDICARE, MARIEL SCHOOFF,  
DAPHNE LANG, JOYCE HAMER, MYRNA ALLICON,  
And the BRITISH COLUMBIA ANESTHESIOLOGISTS' SOCIETY

Intervenors

And:

THE ATTORNEY GENERAL OF CANADA

Pursuant to the *Constitutional Question Act*

**APPLICATION RESPONSE**

Re: April 21, 2016 Application of the Intervenors

Application response of: The Attorney General of Canada, (the "Application Respondent")

THIS IS A RESPONSE TO the notice of application of the Intervenors, Dr. Dunan Etches, Dr. Robert Woollard, Glyn Townson, Thomas Gregor, The British Columbia Friends of Medicare Society and Canadian Doctors for Medicare, by letter dated April 21, 2016, seeking to have Cambie Surgeries Corporation and the Specialist Referral Clinic removed as parties to the Action.

**Part 1: ORDERS CONSENTED TO**

The Application Respondent consents to the granting of the orders set out in the following paragraphs of Part 1 of the notice of application on the following terms: none.

**Part 2: ORDERS OPPOSED**

The Application Respondent opposes the granting of the orders set out in the following paragraphs of Part 1 of the notice of application: none.

**Part 3: ORDERS ON WHICH NO POSITION IS TAKEN**

The Application Respondent takes no position on the granting of the orders set out in ALL paragraphs of Part 1 of the notice of application.

**Part 4: FACTUAL BASIS**

1. The Application Respondent does not take any position with respect to the relief sought by the Intervenor.

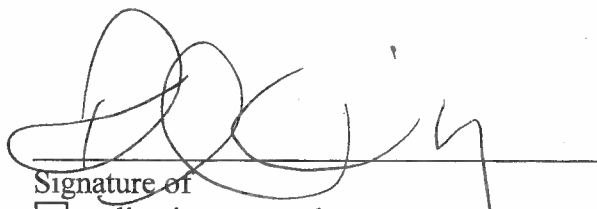
**Part 5: LEGAL BASIS**

1. The Application Respondent makes no submissions with respect to the legal basis for the Intervenor's application.

**Part 6: MATERIAL TO BE RELIED ON**

1. None.

Dated: May 18, 2016



Signature of  
 application respondent  
 lawyer for Application Respondent, the  
Attorney General of Canada  
**Jasvinder S. Basran,**  
Regional Director General  
**Per: Ken Manning**  
Department of Justice  
British Columbia Regional Office

THIS APPLICATION RESPONSE is prepared and served by Jasvinder S. Basran, Regional Director General, British Columbia Regional Office, Department of Justice (Canada), whose place of business and address for service is the Department of Justice, 900 - 840 Howe Street, Vancouver, British Columbia, V6Z 2S9, Telephone: (604) 666-6731, Facsimile: (604) 666-1585, Attention: Ken Manning.