Court File No.: CV-20-00649404-000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

ANN TOUSSAINT, APPOINTED REPRESENTATIVE OF THE ESTATE OF NELL TOUSSAINT, DECEASED, FOR THE PURPOSES OF THIS PROCEEDING

Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

BRIEF OF THE PLAINTIFF'S POSITION REGARDING THE APPOINTMENT OF GERALDINE SADOWAY AS LITIGATION ADMINISTRATOR

Before Case Management Judge: The Honourable Justice Papageorgiou

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Court File No.: CV-20-00649404-000

ONTARIO
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ANN TOUSSAINT, APPOINTED REPRESENTATIVE OF THE ESTATE OF NELL TOUSSAINT, DECEASED, FOR THE PURPOSES OF THIS PROCEEDING

Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

BRIEF OF THE PLAINTIFF'S POSITION REGARDING THE APPOINTMENT OF GERALDINE SADOWAY AS LITIGATION ADMINISTRATOR

Before Case Management Judge: The Honourable Justice Papageorgiou

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B E T W E E N:

ANN TOUSSAINT, APPOINTED REPRESENTATIVE OF THE ESTATE OF NELL TOUSSAINT, DECEASED, FOR THE PURPOSES OF THIS PROCEEDING

Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

Plaintiff's position regarding the appointment of

Geraldine Sadoway as Litigation Administrator

1. The appointment of a litigation administrator is a procedural order that the Court can make at a case conference pursuant to rule 50.13(6) if it is appropriate to do so. As this action is case managed, rule 77.04(1)(e) also applies to allow the Court to make such an order.

2. It is appropriate to make such an order under either or both of these rules. The facts are uncontroversial. The Court has been provided with the consent and curriculum vitae of Ms Sadoway. Ann Toussaint has passed away, as evidenced by the attached death certificate. Also attached hereto are the consents of the next-of-kin of Nell Toussaint, namely all her brothers and sisters, to the appointment of Ms Sadoway.

3. Nell Toussaint died intestate and there is no administrator of her estate as the estate is impecunious. It is appropriate to appoint a litigation administrator of her estate for the purposes

of these proceedings. There is no requirement in law that a litigation administrator be a family member. In any event, the surviving next-of-kin are all in agreement as evidenced by their consents.

4. Rule 9.03(5) recognizes the general power of the Court to order that this proceeding be reconstituted by appointing Geraldine Sadoway as the litigation administrator of the estate of Nell Toussaint, deceased for the purposes of this proceeding and that the title of this proceeding be amended accordingly.

5. Ms Sadoway is an appropriate representative of the estate of Nell Toussaint. As appears from her attached consent and curriculum vitae, Ms Sadoway is a lawyer licensee of the Law Society of Ontario, recently retired in October 2025 from the practice of law. Although no longer practising law, Ms Sadoway continues to be on contract with the Immigration and Refugee Board to serve as Designated Representative in immigration matters before the Immigration and Refugee Board involving minors and vulnerable adults with capacity issues.

6. Ms Sadoway was called to the bar in 1983. Prior to her retirement from practising law in October 2025 Ms Sadoway's professional expertise was as a barrister and solicitor for forty-two years representing applicants in hearings and appeals before provincial and federal courts and tribunals, including the Immigration and Refugee Board, the family and criminal law courts, Federal Courts, Ontario Court of Appeal and the Supreme Court of Canada. During that time she was at various times in private practice, an adjunct professor at Osgoode Hall Law School and at Queen's University Faculty of Law in the fields of international human rights law, human rights law in Canada, and immigration and refugee law, and clinical instructor and supervising

lawyer in immigration and refugee law at Parkdale Community Legal Services, Osgoode Hall Law School and Legal Aid Ontario.

7. Forming part of her professional expertise, in 2006 Ms Sadoway was a non-governmental organization delegate representing Parkdale Community Legal Services and the Canadian Council for Refugees before the United Nations Committee on Economic, Social and Cultural Rights in Geneva, Switzerland concerning Canada's compliance with the Covenant on Economic, Social and Cultural Rights.

8. Among other awards, Ms Sadoway has received an award recognizing her significant contribution in policy, advocacy and settlement for newcomers to Canada.

9. Ms Sadoway's published work includes articles and book chapters on transnational human rights, Canadian human rights, migration and refugee law.

All of which is respectfully submitted by



Andrew C. Dekany, of counsel for the plaintiff

REPUBLIC OF TRINIDAD AND TOBAGO

CERTIFICATE OF DEATH

Name: **ANN THERESA TOUSSAINT**

Date of Death: **25TH AUGUST, 2026**

Age: **74 YEAR(S)**

Sex: **FEMALE**

Rank/Profession: **NO OCCUAPTION**

Informant Name: **CORLISHA CASTLE-VANTERPOOL**

Informant Address: **76 LAMONT STREET, LONGDENVILLE BOROUGH OF CHAGUANAS**

Informant Description: **DAUGHTER**

Country of Birth: **GRENADA**

Place of Death: **33 SANDY LANE BOY CATO ROAD LAS LOMAS NO3, CUNUPIA * - BOROUGH OF CHAGUANAS**

Cause of Death: **ACUTE CEREBROVASCULAR ACCIDENT, CEREBROVASCULAR DISEASE, HYPERTENSION DIABTES ATRIAL FIBRILLATION**

Medical Examiner: **DOCTOR CORRADO FIGARO MBBS MRCP**

Registration Date: **26TH AUGUST, 2026**

Registration District: **SUB DIVISION CUNUPIA WEST, CUNUPIA WARD**

Name of Registrar: **JULIA BROOKS**

Entry No: **000114**

Notes:

ISSUED UNDER MY HAND AND SEAL OF OFFICE ON
26TH AUGUST, 2026

REGISTRAR GENERAL

CERTIFIED TRUE AND CORRECT EXTRACT FROM THE REGISTER OF DEATHS, HELD BY REGISTRAR GENERAL'S DEPARTMENT MINISTRY OF THE ATTORNEY GENERAL AND LEGAL AFFAIRS

D A 0 0 8 6 8 8 2 0

Version 1.0

Court File No.: CV-20-00649404-000

ONTARIO

SUPERIOR COURT OF JUSTICE

B E T W E E N:

ANN TOUSSAINT, APPOINTED REPRESENTATIVE OF THE ESTATE OF NELL TOUSSAINT, DECEASED, FOR THE PURPOSES OF THIS PROCEEDING

Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

CONSENT

I, Geraldine Sadoway, of the City of Toronto, Province of Ontario, a lawyer licensee member of the Law Society of Ontario retired from the practice of law, hereby consent to being appointed as the litigation administrator to represent the estate of the late Nell Toussaint, the plaintiff in the within Ontario Superior Court of Justice action no. CV-20-00649404-000 against the defendant Attorney General of Canada, for the purposes of this proceeding.

Dated at Toronto the 4th day of September 2026

Geraldine Sadoway

Law Society of Ontario lawyer licensee #22880A

(retired from the practice of law)

Curriculum Vitae, Geraldine Sadoway 2026-08-26

Contact Information

Geraldine Sadoway, Barrister and Solicitor
Senior Fellow, Massey College, University of Toronto
Law Office: 1345 St. Clair Avenue West, Unit 3A, Toronto, Ontario M6E 1C3
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gsadowaylaw@gmail.com; geraldine.sadoway@cantab.net; gsadoway@gmail.com

Education

LLM in International Law, University of Cambridge, 2003
LLB Osgoode, 1981, called to Ontario Bar, 1983
MA in Spanish and Latin American Language and Literature, Queen's University, 1974
BA in French and Spanish Language and Literature, Dalhousie University, 1972
Universidad Nacional Autónoma de México (UNAM), Foreign Students Program 1975
Universidad de Zaragoza, Spain, Foreign Students Program, 1970

Employment

2017 to present: on contract with the Immigration and Refugee Board to serve as Designated Representative in immigration maters before the IRB involving minors and vulnerable adults with capacity issues.
2015- 2025: lawyer in private practice specializing in immigration and refugee law,
1997 to 2020: adjunct professor and lecturer, Osgoode Hall Law School (immigration and refugee law, international human rights law)
2015 to 2016: adjunct professor, Queen's University Faculty of Law (international human rights law, human rights law in Canada)
2015 (June – October) Legal Aid Ontario, Staff Review Committee on Professional Standards
1997 to 2015: adjunct professor, clinical instructor and supervising lawyer in immigration and refugee law, Parkdale Community Legal Services, Osgoode Hall Law School and Legal Aid Ontario
1995 to 2000, 2004: adjunct professor and lecturer at Queen's University Law School, teaching immigration and refugee law
1983 to 1997: lawyer in private practice specializing in immigration and refugee law

Professional Expertise

1983 to October, 2025: Barrister and Solicitor representing applicants in hearings and appeals before provincial and federal courts and tribunals, including the Immigration and Refugee Board, the family and criminal law courts, Federal Courts, Ontario Court of Appeal and the Supreme Court of Canada.

1983 to present: speaker and resource person on access to justice for vulnerable groups (children, women, persons with disabilities, immigrants and refugees, racialized and indigenous communities, etc.) in professional development and public legal education programs sponsored by the Law Society of Upper Canada, Canadian and Ontario Bar Associations, Refugee Lawyers Association, Legal Aid Ontario, Canadian Association of Refugee Lawyers, Canadian Council for Refugees, Woman Abuse

Council of Toronto, Canadian Centre for Victims of Torture, Centre for Refugee Studies, AIDS Committee of Toronto, and others.

2010: counsel for the intervener METRAC (Metropolitan Action Committee on Violence Against Women and Children) at the Ontario Court of Appeal and the Supreme Court of Canada in the sponsorship debt recovery case of *Canada (Attorney General) v. Mavi*, 2011 SCC 30.

2006: NGO delegate representing Parkdale Community Legal Services and the Canadian Council for Refugees before the UN Committee on Economic, Social and Cultural Rights in Geneva concerning Canada's compliance with the *Covenant on Economic, Social and Cultural Rights.*

1989 to 2012: member of advisory committee and peer mentor for Legal Aid Ontario and the Ontario Legal Aid Plan.

1985 to 1997: member of Board of Directors, Canadian Centre for Victims of Torture: member of CCVT Legal and Medical Committee.

Awards

2009: Osgoode Hall Law School award for teaching excellence
2002: Canadian Centre for Victims of Torture *Amina Amalko Award* for women who have made a significant contribution in policy, advocacy and settlement for newcomers
1996: Somali –Canadian Association award for service to refugees

Professional memberships, publications and presentations

Memberships
Senior Fellow of Massey College, Canadian Bar Association, Refugee Lawyers Association, Canadian Association of Refugee Lawyers, Law Union of Ontario, Canadian Council for Refugees, Canadian Centre for Victims of Torture, Centre for Refugee Studies of York University, Association for Canadian Clinical Legal Education, Botanical Artists of Canada, American Society of Botanical Artists, Women's Art Association of Canada.

Selected Publications

"Protection Measures for Unaccompanied Migrant Children in Canada" Chapter 15 of *Protecting Migrant Children: In Search of Best Practice,* Eds. Crock, Benson, Elgar Publishing, 2018)

Refuge: Canada's Journal on Refugees, Vol 34, No. 1, Book review of *The Child in International Refugee Law* by Jason M. Pobjoy

Canadian Human Rights Law & Commentary [Third Edition], Stanley M. Corbett, Geraldine Sadoway, LexisNexis, Nov 2016

"Transnational Human Rights in Partnership with Community Legal Clinics" *International Journal of Clinical Legal Education*, Northumbria, UK, 2017

"Pushing the Boundaries of Clinical Law" in *Journal of Law and Social Policy*, Vol 23, Osgoode Hall Law School, 2014: http://digitalcommons.osgoode.yorku.ca/jlsp/

"Practical Tips: Representing Minors & Persons with Mental Health Disorders or Disability before the IRB" LAO Quality Service Office, June 2007

"The Gender Factor in Refugee Determination and the Effect of the Gender Guidelines" in *Not Born a Refugee Woman,* eds. H. Moussa, M.Hajdukowski-Ahmed, N. Khanlou, Berghahn Books, NY 2008

"Children at Risk" *Refuge: Canada's Periodical on Refugees*, Vol. 20, No. 2, February 2002: http://pi.library.yorku.ca/ojs/index.php/refuge/issue/view/1257

"Canada's Treatment of Separated Refugee Children" *European Journal of Migration and Law*, 3: pp. 347 - 381, 2001

"Refugee Children before the Immigration and Refugee Board" 35 *Immigration Law Reporter* 106

"Representation of Minors before the IRB" *Refuge*, Volume 15, Number 5, 1996: http://pi.library.yorku.ca/ojs/index.php/refuge/issue/view/1347. Also published in *Working with Refugee and Immigrant Children: Issues of Culture, Law and Development,* Lutheran Immigration and Refugee Service, New York, 1998

"Refugee Mental Health: A Lawyer's Perspective" *Condition Critical,* Hong Fook Mental Health Association, Toronto, 1992

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ONTARIO

SUPERIOR COURT OF JUSTICE

B E T W E E N:

ANN TOUSSAINT, APPOINTED REPRESENTATIVE OF THE ESTATE OF NELL TOUSSAINT, DECEASED, FOR THE PURPOSES OF THIS PROCEEDING

Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

CONSENT

The undersigned, being all of the surviving children of the late Ann Toussaint who passed away on 25 August 2026, as appears from the attached certificate of death issued on 26 August 2026, and being all of the surviving siblings of the late Nell Toussaint whose estate is the plaintiff in the within action, hereby consent to Geraldine Sadoway, of the City of Toronto, Province of Ontario, Canada being appointed as the litigation administrator to represent the estate of Nell Toussaint, deceased for the purposes of this action.

Dated as of 29 August 2026

.....
Andy Toussaint- Nicholas

.....
Corlisha Castle-Vanterpool

.....
Nevlyn Toussaint

.....
Russel Castle

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Nigel Toussaint- Grayson

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Jameliah Jack

.....
Kenroy Toussaint

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Jeremy Ferdinand

.....
Michael Castle

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ONTARIO
SUPERIOR COURT OF JUSTICE

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ANN TOUSSAINT, APPOINTED REPRESENTATIVE OF THE ESTATE OF NELL TOUSSAINT, DECEASED, FOR THE PURPOSES OF THIS PROCEEDING

Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

CONSENT

The undersigned, being all of the surviving children of the late Ann Toussaint who passed away on 25 August 2026, as appears from the attached certificate of death issued on 26 August 2026, and being all of the surviving siblings of the late Nell Toussaint whose estate is the plaintiff in the within action, hereby consent to Geraldine Sadoway, of the City of Toronto, Province of Ontario, Canada being appointed as the litigation administrator to represent the estate of Nell Toussaint, deceased for the purposes of this action.

Dated as of 29 August 2026

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Andy Toussaint- Nicholas

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Corlisha Castle-Vanterpool

Dorothy Nevlyn Toussaint
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Nevlyn Toussaint

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Russel Castle

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Nigel Toussaint- Grayson

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Jameliah Jack

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Kenroy Toussaint

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Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

CONSENT

The undersigned, being all of the surviving children of the late Ann Toussaint who passed away on 25 August 2026, as appears from the attached certificate of death issued on 26 August 2026, and being all of the surviving siblings of the late Nell Toussaint whose estate is the plaintiff in the within action, hereby consent to Geraldine Sadoway, of the City of Toronto, Province of Ontario, Canada being appointed as the litigation administrator to represent the estate of Nell Toussaint, deceased for the purposes of this action.

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Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

CONSENT

The undersigned, being all of the surviving children of the late Ann Toussaint who passed away on 25 August 2026, as appears from the attached certificate of death issued on 26 August 2026, and being all of the surviving siblings of the late Nell Toussaint whose estate is the plaintiff in the within action, hereby consent to Geraldine Sadoway, of the City of Toronto, Province of Ontario, Canada being appointed as the litigation administrator to represent the estate of Nell Toussaint, deceased for the purposes of this action.

Dated as of 29 August 2026

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Nigel Toussaint- Grayson

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Jeremy Ferdinand

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ONTARIO
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Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

CONSENT

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Dated as of 29 August 2026

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Plaintiff

and

ATTORNEY GENERAL OF CANADA

Defendant

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Jameliah Jack
Jameliah Jack

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Kenroy Toussaint

Jeremy Ferdinand
Jeremy Ferdinand

.....
Michael Castle

Court File No.: CV-20-00649404-0000

TOUSSAINT (ESTATE OF)
Plaintiff

-and-

ATTORNEY GENERAL OF CANADA
Defendant

ONTARIO
SUPERIOR COURT OF JUSTIICE

Proceeding commenced at Toronto

BRIEF OF PLAINTIFF'S POSITION REGARDING THE APPOINTMENT OF GERALDINE SADOWAY AS LITIGATION ADMINISTRATOR
before Her Honour Justice Papageorgiou

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Lawyers for the Plaintiff