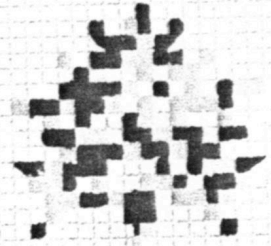


WOMEN'S LEGAL EDUCATION
AND ACTION FUND



1260 Bay Street, Third Floor, Toronto, Ontario M5R 2B8

(416) 964-2789

October 9, 1985.

The Honourable Harvie André,
Associate Minister of
National Defence,
Room 558,
Confederation Building,
Ottawa, Ontario.
K1A 0A6

Dear Mr. André:

As you know, Mrs. Lucie Richardson, the President of the Organization of Spouses of Military Members (OSOMM) is very interested in meeting with you to clarify certain information and with a view to settlement of the legal action which has recently been filed by herself and OSOMM against the Department of National Defence.

Mrs. Richardson's solicitor, Neil Wittman of Code, Hunter is in Calgary, Alberta. Because of our involvement in this action and because of our proximity to Ottawa, Mrs. Richardson and her solicitor have agreed that a representative of the Women's Legal Education and Action Fund should attend with Mrs. Richardson any meetings which are arranged in Ottawa.

However, we understand from Ms. Cindy Boucher of your office that you will only meet with Mrs. Lucie Richardson if she comes to meet with you alone. Mrs. Richardson was informed that she could not meet with you with her solicitor, or another member of the Organization of Spouses of Military Members.

In light of the fact that Mrs. Richardson is one of the individual plaintiffs in the legal action which is

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pending, as well as the President of the Organization of Spouses of Military Members, we find it surprising that you would require that she come to a meeting with you alone.

Let me repeat, we are very interested in meeting with you. However, we do not consider it acceptable for Mrs. Richardson to be isolated with you and your advisors.

We look forward to meeting with you, and hope to hear from your office regarding suitable arrangements.

Yours sincerely,

Shelagh Day,
President.

SD:sg

LEAF's present mailing address is: 347 Bay Street, Suite 307,
Toronto, Ontario. M5H 2R7
Telephone: (416) 868-0979



WOMEN'S LEGAL EDUCATION AND ACTION FUND

344 RUE BLOOR ST. W., SUITE 403, TORONTO

FONDS D'ACTION ET D'EDUCATION JURIDIQUES POUR LES FEMMES

CANADA M5S 1W9 416-963-9654

Charitable Registration
#0699991-21-13
Numéro d'Enregistrement

June 24, 1986

Ms. Lucie Richardson
34 Brock Crescent
F.H.H.
Kingston, Ontario
K7K 5K8

Dear Lucie:

I thought your presentation to the Senate was terrific,
and I was delighted to meet you.

A copy of LEAF'S Litigation Report is enclosed, and you
will note that the OSSOMM case figures quite prominently in it.
I am sure the Discoveries will go well, and we will be pleased to
pay your air fare just as soon as you can tell us the cost.

Yours sincerely,

A handwritten signature in black ink, appearing to be "Gwen Brodsky", written in a cursive style.

Gwen Brodsky
Litigation Director

GB:dc
Encl.

BRODSKY



COPY

Charitable Registration
#0699991-21-13
Numéro d'Enregistrement

WOMEN'S LEGAL EDUCATION AND ACTION FUND

344 RUE BLOOR ST. W., SUITE 403, TORONTO

FONDS D'ACTION ET D'EDUCATION JURIDIQUES POUR LES FEMMES

CANADA M5S 1W9 416-963-9654

July 24, 1986

Neil C. Wittmann,
Code, Hunter,
Barristers and Solicitors,
Suite 1900,
736 - 6th Avenue S.W.,
Calgary, Alberta.
T2P 3W1

Dear Mr. Wittmann:

Re: OSSOMM v. Attorney General for Canada
Your File 31484/NCW - LEAF File 16

I am writing in reply to your correspondence concerning the proposed amendment to Article 19.44 of the Queen's Orders and Regulations.

I have reviewed the matter with LEAF's Legal Committee, and our view is that it may be advisable to amend the pleadings to state that OSSOMM's activities would be caught by the new regulation. This view is based on our desire to ensure that the issues raised in the case are resolved in a final, practical manner. It would not be a final or practical resolution if we won our case based on a strict interpretation of the old Article 19.44, but the military then invoked the new 19.44 to restrict OSSOMM's activities. Our reservation about amending the pleadings is that an amendment may create an excuse for a delay by the other side, and we would like to proceed to trial without delay, if possible.

Could you please weigh our concerns, amend the pleadings as you think necessary, and set the case down for hearing.

I had hoped that we might discuss this, but your office advises that you are on vacation until the end of July, and I will be on vacation for the month of August. If you require additional instructions or assistance from us during the month

of August, LEAF's Executive Director Christie Jefferson will be available.

Incidentally, I believe that Leslie Taylor is moving to Germany on August 26, 1987. If any of Leslie's undertakings from the discoveries are still outstanding, you may wish to contact her prior to the 26th.

Thank you.

Yours sincerely,



Gwen Brodsky,
Litigation Director.

GB:maw

cc ✓ Lucie Richardson

Leslie Taylor



WOMEN'S LEGAL EDUCATION AND ACTION FUND

FONDS D'ACTION ET D'EDUCATION JURIDIQUES POUR LES FEMMES

344 RUE BLOOR ST. W., SUITE 403, TORONTO

CANADA M5S 1W9 416-963-9654

September 24, 1987

COPY

Mary Eberts,
Tory, Tory, DesLauriers
& Binnington,
Barristers and Solicitors,
Suite 3200, IBM Tower,
P.O. Box 270,
Toronto-Dominion Centre,
Toronto, Ontario.
M5K 1N2

Dear Mary:

Re: O.S.S.O.M.M. - LEAF File No. 16

Please find enclosed herewith a reporting letter from Code Hunter.

As you will know from Senator Marsden, Perrin Beatty the Minister of National Defence appointed a small committee to hold hearings on the topic of political activity on the armed forces bases. This summer, the committee, chaired by Desmond Morton, toured selected bases and heard submissions from armed forces people. We do not know whether the committee has reported yet, however, we are advised that the committee favours a relaxed approach to partisan political activity on the bases. We are told that the committee approves of political campaigning on the bases.

The committee's recommendations do not appear to meet the concerns raised by the O.S.S.O.M.M. women in our legal case. Nonetheless, it seems likely to me that the O.S.S.O.M.M. case is the inspiration for Mr. Beatty's decision to look into the topic of political activity.

As this is the first sign of interest in the case that the Federal Government has shown, and as Beatty is a new Minister, it may be timely to propose settlement discussions. I have discussed this with Lucie Richardson and told her that I would raise

the matter with the Legal Committee. Lucie thinks it would be a good idea to approach Mr. Beatty.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Gwen Brodsky', written in a cursive style.

Gwen Brodsky,
Litigation Director.

GB:maw
Encl.

cc Lucie Richardson