



SENT VIA E-MAIL

March 7, 2025

Ms. Judy Dubois

Registry Officer – Canadian Human Rights Tribunal
Administrative Tribunals Support Service of Canada / Government of Canada
240 Sparks Street, 6th floor West, Ottawa ON K1A 1J4
registry.office@chrt-tcdp.gc.ca

Dear Ms. Dubois:

Re: Joint Motion by Interested Parties NAN and COO relating to the Ontario Final Agreement and the Trilateral Agreement (CHRT File T1340/7008)

I am writing on behalf of Nishnawbe Aski Nation (“NAN”), further to the correspondence of Maggie Wente, sent on behalf of Chiefs of Ontario (“COO”) earlier today, March 7, 2025.

As indicated in Ms. Wente’s correspondence, NAN and COO are respectfully filing a joint motion to the Tribunal regarding the *Final Agreement on Long-Term Reform of the First Nations Child and Family Services Program in Ontario* (the “Ontario Final Agreement”) and the *Trilateral Agreement in Respect of Reforming the 1965 Agreement* (“The Trilateral Agreement”).

Pursuant to Ms. Wente’s letter, please find attached the **affidavit of Grand Chief Alvin Fiddler**, filed in support of the above-noted joint motion, alongside a **three-volume set of Exhibit Books**, and the set of **“Remote Quotient” reports previously filed with the Tribunal**.

Similar to COO, NAN will be providing three (3) hard copies of these materials to the Tribunal, and can make arrangements to provide hard copies to the other parties on request.

We respectfully agree with COO’s proposal that there should be dedicated Case Management focused solely on the joint NAN-COO motion. To that end, we also respectfully request that the Tribunal set a Case Management call on the NAN-COO motion for later in the week of March 17, 2025 or during the week of March 24, 2025. Thank you.

Yours very truly,

Julian Falconer
Counsel to Nishnawbe Aski Nation



Encl. (5 pdfs)

- Affidavit of Grand Chief Alvin Fiddler, NAN (March 7, 2025)
- NAN Exhibits to the Fiddler Affidavit, Volumes 1-3 (March 7, 2025)
- NAN Remoteness Quotient Reports, Phase 1 and 2 (Collected)

**CC Maggie Wentte, Olthuis, Kleer, Townshend LLP
Paul Vickery, Dayna Anderson, Kevin Staska, Sarah-Dawn Norris, Sarah-Dawn Norris,
Meg Jones, Samantha Gergely, Cara Verhaeghe, - Counsel for Canada
Anushumala Juyal and Khizer Pervez - Counsel for CHRC
David Taylor, Sarah Clarke, Kiana Saint Macary - Counsel for FNCFCFS
Adam Williamson- Counsel for AFN
Justin Safayeni and Stephen Aylward - Counsel for Amnesty International**

