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 File T927397

December 12, 2000

**VIA FACSIMILE**

Mr. Paul Cavalluzzo  
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Dear Sirs:

**RE: Walkerton Inquiry - OPSEU's Representation of Its Members**

As you know, one of OPSEU's members, Chris Johnston, was called as a witness before the Inquiry last week.

As you also know, OPSEU has standing before the Inquiry to represent its members, especially in the event that the Commission wishes to call an OPSEU member to testify at the Inquiry.

This letter is to confirm that, before an OPSEU member is interviewed by either Commission Counsel or by counsel to the Ministry of the Environment, or indeed any other Ministry, for the purpose of testifying at the Inquiry, Commission Counsel and Government of Ontario Counsel will first contact me ((416) 862-4319) or Donald Eady ((416) 866-4321).

In addition, no interview of an OPSEU member is to take place, for the purpose of testifying before the Inquiry, by either Commission Counsel or Counsel for the Government of Ontario *until* we have first had an opportunity to discuss such matters with the OPSEU member. Further, any interview

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with the OPSEU member is to be scheduled through this office so that we may attend the interview as the OPSEU member's legal representative.

Unfortunately, this protocol was not followed for Chris Johnston. However, we understand, from discussions with your offices, that you now appreciate that this protocol is to be followed with respect to all OPSEU members, and that you will adhere to it. We anticipate your cooperation in this regard. We trust you now appreciate that the scope of the OPSEU bargaining unit includes "contract" employees employed by the Government of Ontario.

Yours very truly,

**GOWLING LAFLEUR HENDERSON LLP**

Ian J. Roland

IJR:ap

cc: Tim Hadwen

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