



No. 18 0247
Victoria Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

WEST MOBERLY FIRST NATIONS, and ROLAND WILLSON ON HIS OWN BEHALF
AND ON BEHALF OF ALL OTHER WEST MOBERLY FIRST NATIONS BENEFICIARIES
OF TREATY NO. 8

PLAINTIFFS

AND:

HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE
OF BRITISH COLUMBIA, THE ATTORNEY GENERAL OF CANADA, and BRITISH
COLUMBIA HYDRO AND POWER AUTHORITY

DEFENDANTS

APPLICATION RESPONSE

Application Response of: Her Majesty the Queen in Right of the Province of British Columbia
(the "Province").

THIS IS A RESPONSE TO the notice of application of British Columbia Hydro and Power
Authority ("BC Hydro"), filed March 29, 2018.

Part 1: ORDERS CONSENTED TO

The Province consents to the granting of all of the orders set out in Part 1 of the notice of the
notice of application.

Part 2: ORDERS OPPOSED

None.

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

None.

Part 4: FACTUAL BASIS

1. The Province agrees with the facts as set out in Part 2 of the notice of application.

Part 5: LEGAL BASIS

2. The Province agrees with the submissions made in Part 3 of the notice of application.

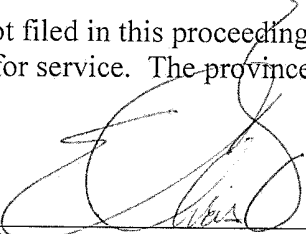
Part 6: MATERIAL TO BE RELIED ON

1. Affidavit #1 of Beth Hrychuk, made January 30, 2018.
2. Affidavit #1 of Marc Eliesen, made January 26, 2018.
3. Affidavit of Steve Graham, made January 29, 2018.
4. Affidavit #1 of Petr Komers, made January 30, 2018.
5. Affidavit #2 of Petr Komers, made January 30, 2018.
6. Affidavit #1 of Robert McCullough, made January 31, 2018.
7. Affidavit #1 of Annette Muttray, made January 29, 2018.
8. Affidavit #1 of Rachel Olson, made January 30, 2018.
9. Affidavit of Jim Pojar, made January 30, 2018.
10. Affidavit #1 of David Schindler, made January 31, 2018.
11. Affidavit #1 of Harry Swain, made January 31, 2018.
12. Notice of Civil Claim filed January 15, 2018.
13. Notice of Application filed January 31, 2018.
14. Case Plan Order of Master Bouck made February 23, 2018.
15. Such further and other material as counsel may advise and this honourable Court permit.

The Province estimates that this application will take 1 hour.

- The Province has filed in this proceeding a document that contains the Province's address for service.
- The Province has not filed in this proceeding a document that contains the Province's address for service. The province's ADDRESS FOR SERVICE is:

Date: April 5, 2018



Signature of Erin K. Christie
Lawyer for the Province