

2007 01T4955CP

**IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
TRIAL DIVISION (GENERAL)**

B E T W E E N:

**CAROL ANDERSON, ALLEN WEBBER
and JOYCE WEBBER**

PLAINTIFFS

AND:

THE ATTORNEY GENERAL OF CANADA

DEFENDANT

BROUGHT UNDER THE *CLASS ACTIONS ACT*, S.N.L. 2001, C. C-18.1

AND BETWEEN:

TOBY OBED, WILLIAM ADAMS and MARTHA BLAKE

2007 01T5423 CP

- and -

THE ATTORNEY GENERAL OF CANADA

ROSINA HOLWELL and REX HOLWELL

2008 01T0844 CP

- and -

THE ATTORNEY GENERAL OF CANADA

SARAH ASIVAK and JAMES ASIVAK

2008 01T0845 CP

- and -

THE ATTORNEY GENERAL OF CANADA

EDGAR LUCY and DOMINIC DICKMAN

2008 01T0846 CP

- and -

THE ATTORNEY GENERAL OF CANADA

WRITTEN INTERROGATORIES OF THE PLAINTIFF

NIS-01324 – 1175- Memorandum dated January 11, 1945

1. What is this document?
2. Who was the author of this document?
3. Who was the recipient of this document?

4. Provide a legible copy of this document.

NIS-01164 – 0995 – Letter dated March 1, 1945

5. What is this document?

6. Who was the author of this document?

7. Who was the recipient of this document?

8. Provide a legible copy of this document.

NIS-00411-0589- Report dated March 18, 1945

9. What are the two boarding schools referred to in this document?

10. What is the name of the day school referred to in this document?

11. What was the breakdown of students attending the two boarding schools and the day school referenced?

12. What communities were served by these boarding schools and day school?

13. What “educational facilities” were provided at the boarding schools and day school?

NIS-00186-0270- Memorandum dated July 4, 1947

14. Who was the “Director” author of this document?

15. Who was the recipient of this document?

16. Who provided the “per capita grant for each Indian or Eskimo child educated ...in these schools.”?

17. Provide a list of schools that were “church owned”.

18. Provide a list of schools that were “government owned”.

19. Which provision of the Indian Act “provides for compulsory education of Indian children between the full ages of 7 and 16 years in either our day or residential schools.”?

20. Did the federal government “pay tuition fees for Indian children who are attending elementary or high schools conducted by municipal school boards or by provincial departments of education.”? If yes, were these tuition fees paid directly to the school boards or to the provincial departments?

NIS-00185-0269 – Letter dated May 19, 1948

21. Who was “J. G. Wright”, the author of this document?

22. Who was “Mr. Gibson”, the recipient of this document?
23. What “Department’s activities” are referred to in this document?
24. Is the estimate of “1100 Eskimo and 1300 Indians” accurate?
25. What is the decision that is to be made on June 3rd, as referred to in this document?

NIS00229[01-03]-0324- Memorandum dated August 9, 1948

26. Who was the author of this document?
27. Who was the recipient of this document?
28. Does the defendant agree that the benefits listed in this document would accrue to Newfoundland’s Indians and Eskimos in the event that Newfoundland became a province of Canada? If the defendant disputes that any of these benefits would apply, indicate which of these would not apply?
29. Provide a copy of the attachment referenced on page 2 of the document, (i) how family allowances are paid to Indians and Eskimos, and “(ii) how Indian and Eskimo children are educated.”.

NIS-03507[01-01]-2021- Report dated April 22, 1949?

30. What does the phrase “Education in this District is on a very low standard” mean?
31. Were any measures taken at the time this document was prepared to improve the standard of education at the Makkovik Boarding School referred to therein?
32. Provide a legible copy of this document.

NIS-00215-0308- Report dated October 31, 1949

33. Who was “Harold Horwood”, the author of this document?
34. Why was this report sought?
35. Were the estimates for “Capital Account” and Operating Account” provided to the federal government and did the federal government provide funding for these items?
36. How did Canada come to be in possession of this document?

NIS-03523-2038- Letter dated February 27, 1950

37. What is this document?
38. Who is the author “J.W. Peacock”?

39. Who was the recipient of this document?
40. Did the federal government receive a copy of this document at the time it was prepared or at any other time?
41. Provide a legible copy of this document.

NIS-03529-2044- Report dated May 15, 1950

42. Who was the author of this document?
43. Who was the recipient of this document?
44. Did the federal government receive a copy of this document at the time it was prepared or at any other time?
45. Who commissioned the visit to the schools mentioned in the document and requested a report on the visit?
46. Provide a legible copy of this document.

NIS-00493-0680- Letter dated February 7, 1953

47. What is this document?
48. Who was the author of this document?
49. Who was the recipient of this document?
50. Did the federal government receive a copy of this document at the time it was prepared or at any other time?
51. Provide a legible copy of this document.

NIS-03308-1812- Letter dated May 4, 1955

52. What is this document?
53. Did the federal government receive a copy of this document at the time it was prepared or at any other time?
54. Provide a legible copy of this document.

NIS-03164-1653- Letter dated October 23, 1963

55. Provide a legible copy of this document.

NIS-00274[00-02]-0383- Memorandum dated November 4, 1963

56. Provide a copy of this document.

NIS-03127-1612- Letter dated June 8, 1964

57. Who was the author of this document?

58. Did the federal government receive a copy of this document at the time it was prepared or at any other time?

59. Provide a full copy of this document.

NIS-03121-1606- Letter dated July 30, 1964

60. Who was the author of this document?

61. Did the federal government receive a copy of this document at the time it was prepared or at any other time?

62. Provide a full copy of this document and its referenced attachment, Cabinet Document 288-64.

NIS-03110-1595- Letter dated April 13, 1965

63. Provide a full copy of this document.

64. Does the defendant dispute the truth or authenticity of this document?

NIS-03916-2453- Report dated August 1, 1975

65. Who was the recipient of this document?

66. What was the purpose of this document?

67. Did the federal government commission this report or have any input in the drafting of the report?

68. Did the federal government receive a copy of this document at the time it was prepared or at any other time?

69. Were the recommendations outlined in this report implemented? If so, by when?

NIS-03672-2199- Chart dated May 24, 1984

70. What is this document?

71. What is the purpose of this document?

- 72. Who prepared this document?
- 73. Who was provided with a copy of this document?

NIS-03912[01-01]-2449- Undated Report on Inuit Schools

- 74. Who is the author of this document?
- 75. Who was the recipient of this document?
- 76. Did the federal government receive a copy of this document at the time it was prepared or at any other time?
- 77. Did the federal government commission this report?
- 78. Provide a legible copy of this document.
- 79. Does the defendant dispute the document's truth or authenticity?

Anderson et al. The Attorney General of Canada
Plaintiffs and Defendant

Court File No: 2007 01T4955CP

**IN THE SUPREME COURT OF NEWFOUNDLAND
AND LABRADOR TRIAL DIVISION (GENERAL)**

Proceeding commenced at the City of St. John's

BROUGHT UNDER THE CLASS ACTIONS ACT,
S.N.L. 2001, C. C-18.1, BEFORE THE HONOURABLE
MADAM JUSTICE BUTLER,
CASE MANAGEMENT JUDGE

**WRITTEN INTERROGATORIES
OF THE PLAINTIFF**

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