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Court Administration

SEP 14 2012

Halifax, N.S. *JP*

September 14, 2012

The Honourable Judge in Chambers  
Supreme Court of Nova Scotia  
The Law Courts  
1815 Upper Water St.  
Halifax, NS B3J 1S7

FAX TRANSMISSION

TO: Supreme Court of Nova Scotia  
FROM: Matthew J.D. Moir  
FAX: 424-0524

Original will be kept in file  
Number of Pages: 3

MY LORD/LADY:

*Re.: Angela Jones v. Halifax Regional Municipality; Judicial Review of Decision of Returning Officer Purporting to Disqualify the Applicant as an Election Candidate*

I am writing to request an emergency hearing pursuant to Rule 28.01.

I represent Ms. Jones, who is a candidate in the upcoming municipal election. Ms. Jones is also an employee of the municipality's. She is a lawyer in the legal department. However, at the time she filed her nomination with the returning officer, she was on a parental or maternity leave of absence. Ms. Jones raised this with the returning officer when she filed her nomination papers, and the returning officer represented that Ms. Jones's maternity or parental leave qualified as "leave" pursuant to the *Municipal Elections Act* (which we maintain was correct).

The returning officer accepted Ms. Jones's nomination and added her to the list of candidates. However, upon review, the returning officer changed her mind and determined that Ms. Jones was not qualified to run as a candidate, because her maternity or parental leave did not qualify as "leave" pursuant to the *Municipal Elections Act*, and removed Ms. Jones from the list of candidates and issued a press release advising the same.

We say that the returning officer acted without jurisdiction, that once the nomination papers