

*Norris v. Calgary (City)*

1. The facts are as found by Justice Perez, as stated in the Official Problem. Mooters may conduct any research they see fit in developing their arguments. Mooters are also permitted to refer to any domestic or foreign law in their written and/or oral arguments. However, no reference shall be made, in written or oral arguments, to any legislative, social, or adjudicative facts beyond those found by Justice Perez. Without limiting the generality of that direction, other than as identified in the Official Problem, social facts arising from the ongoing COVID-19 pandemic should not be referred to for the purposes of the Wilson Moot.
2. The High Court of the Dominion of Canada will not entertain submissions on any issues other than the three constitutional questions for which the Court granted leave. Mooters may raise any arguments relating to those issues that they see fit, regardless of whether they were referred to in the excerpts of the judgments below in the Official Problem. The only remedy sought by Annette is a declaration that the Bylaw is of no force or effect pursuant to section 52 of the *Constitution Act, 1982*.
3. There is a typographical error in paragraph 23(g) of the Official Problem. The final sentence of that paragraph should read: “Several residents have complained that they are now afraid to enter parks where encampments are located, particularly with their children, and city staff have faced harassment and threats from encampment residents.”
4. The statistical evidence provided by Dr. Hazelman was collected prior to the City’s implementation of the PTS plan, and does not account for or reflect the impact of that program.
5. The assault that Annette suffered while a resident at Outreach occurred on shelter property.
6. Councillor Hosseini’s evidence was that if the City moved to enforce the eviction notices, encampment residents who did not agree to relocate to a temporary shelter would be physically removed from the park and that any property they left behind would be disposed of.
7. Justice Perez made no specific findings of fact with respect to the gender demographics of the Rocky Hill encampment, but the parties agree that individuals identifying as cis men, cis women, and transgender men and women have all lived together in the encampment.