Court File No. A-XXX-XX

**FEDERAL COURT OF APPEAL**

BETWEEN:

NAME(S) OF PARTY(IES)

Moving Party(ies)/[choose one: Appellant(s)/Applicant(s) or Respondent(s)] in [choose one: Appeal/Application]

and

NAME(S) OF PARTY(IES)

Responding Party(ies)/[choose one: Appellant(s)/Applicant(s) or Respondent(s)] in [choose one: Appeal/Application]

**[choose one: MOVING PARTY’S/RESPONDING PARTY’S/ETC.] WRITTEN REPRESENTATIONS**

*Motion made on [date] pursuant to Rule 369.2 of the Federal Courts Rules*

**NAME OF PARTY**

Address for service

Tel:

Fax:

Email:

[Moving Party /Responding Party/etc.]

**TABLE OF CONTENTS**

[OVERVIEW 2](#_Toc147384912)

[PART I – STATEMENT OF FACTS 2](#_Toc147384913)

[PART II – POINTS IN ISSUE 3](#_Toc147384914)

[PART III – SUBMISSIONS 3](#_Toc147384915)

[Heading – Be descriptive of the first submission you will make 3](#_Toc147384916)

[Heading – Be descriptive of the next submission you will make 4](#_Toc147384917)

[Heading – Be descriptive of the next submission you will make 4](#_Toc147384918)

[PART IV – ORDER SOUGHT 4](#_Toc147384919)

[PART V – LIST OF AUTHORITIES 5](#_Toc147384920)

[LEGISLATION/REGULATIONS 5](#_Toc147384921)

[CASE LAW 6](#_Toc147384922)

[SECONDARY SOURCES 6](#_Toc147384923)

# OVERVIEW

1. This section provides a high-level summary of what the motion (etc.) is about.
2. An example would be:
3. The Moving Party seeks [describe the relief the Moving Party is seeking on the motion]. The reasons for this are [reason 1, reason 2, reason 3, etc.].

# PART I – STATEMENT OF FACTS

1. This section is used to describe relevant facts.
2. It may help to keep to one fact per paragraph, or at least, one group of related facts per paragraph.
3. When describing a fact, it helps to provide a reference to where that fact comes from.
4. An example would be:
5. The trial judge found that the contract was breached: Reasons for decision at para. 7.
6. Etc.
7. Etc.

# PART II – POINTS IN ISSUE

1. This section is used to describe the issue(s) that the party believes the Federal Court of Appeal must address in order to make the right decision on the motion (etc.).
2. As an example:
3. The first issue is [describe the first issue]
4. The second issue is [describe the second issue].
5. The third issue is [describe the third issue, if there is one].
6. Etc.

# PART III – SUBMISSIONS

## Heading – Be descriptive of the first submission you will make

1. Here is where you will make your submissions on the first issue.
2. Etc.
3. Etc.
4. Etc.

## Heading – Be descriptive of the next submission you will make

1. Here is where you will make your submissions on the next issue.
2. Etc.
3. Etc.
4. Etc.
5. Etc.

## Heading – Be descriptive of the next submission you will make

1. Here is where you will make your submissions on the next issue.
2. Etc.
3. Etc.
4. Etc.
5. Etc.

# PART IV – ORDER SOUGHT

1. State briefly what order you would like the Court to make in disposing of the motion.
2. As an example:
3. The [name of party] requests an order that [describe the relief sought].

All of which is respectfully submitted, this [day] of [month], [year].

[signature]\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**NAME OF PARTY**

Address for service

Tel:

Fax:

Email:

[Moving Party/Responding

Party/etc.]

# PART V – LIST OF AUTHORITIES

## LEGISLATION/REGULATIONS

1. Name of relevant law or regulation and the relevant sections of that law or regulation [or as the case may be].
2. Name of another relevant law or regulation and the relevant sections of that law or regulation [or as the case may be].
3. Etc.
4. As an example:
5. [*Interpretation Act*, R.S.C., 1985, c. I-21, s. 26](https://laws.justice.gc.ca/eng/acts/i-21/FullText.html#s-26).
6. [*Access to Information Act*, R.S.C., 1985, c. A-1, s. 1](https://laws.justice.gc.ca/eng/acts/A-1/FullText.html#s-1).
7. [*Migratory Birds Regulations*, 2022, SOR/2022-05, s. 3](https://laws.justice.gc.ca/eng/regulations/SOR-2022-105/FullText.html#s-3).

## CASE LAW

1. Name of relevant case and citation. Include a hyperlink to the decision if publicly available.
2. Name of second relevant case and citation. Include a hyperlink to the decision if publicly available.
3. Etc.
4. As an example:
5. *Housen v. Nikolaisen*, [2002 SCC 33](https://decisions.scc-csc.ca/scc-csc/scc-csc/en/item/1972/index.do).
6. *Canada (Minister of Citizenship and Immigration) v. Vavilov*, [2019 SCC 65](https://decisions.scc-csc.ca/scc-csc/scc-csc/en/item/18078/index.do).

## SECONDARY SOURCES

1. Include any relevant secondary sources (such as books, articles, commentary, etc) here.
2. Etc.
3. Etc.