

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.]

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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

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

PART II – POINTS IN ISSUE

11. 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.).
12. As an example:
13. The first issue is [describe the first issue]
14. The second issue is [describe the second issue].
15. The third issue is [describe the third issue, if there is one].
16. Etc.

PART III – SUBMISSIONS

Heading – Be descriptive of the first submission you will make

17. Here is where you will make your submissions on the first issue.

18. Etc.

19. Etc.

20. Etc.

Heading – Be descriptive of the next submission you will make

21. Here is where you will make your submissions on the next issue.

22. Etc.

23. Etc.

24. Etc.

25. Etc.

Heading – Be descriptive of the next submission you will make

26. Here is where you will make your submissions on the next issue.

27. Etc.

28. Etc.

29. Etc.

30. Etc.

PART IV – ORDER SOUGHT

31. State briefly what order you would like the Court to make in disposing of the motion.

32. As an example:

33. 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.](#)
6. [*Access to Information Act*, R.S.C., 1985, c. A-1, s. 1.](#)
7. [*Migratory Birds Regulations*, 2022, SOR/2022-05, s. 3.](#)

CASE LAW

8. Name of relevant case and citation. Include a hyperlink to the decision if publicly available.
9. Name of second relevant case and citation. Include a hyperlink to the decision if publicly available.
10. Etc.
11. As an example:
12. *Housen v. Nikolaisen*, [2002 SCC 33](#).
13. *Canada (Minister of Citizenship and Immigration) v. Vavilov*, [2019 SCC 65](#).

SECONDARY SOURCES

14. Include any relevant secondary sources (such as books, articles, commentary, etc) here.
15. Etc.
16. Etc.