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July 25, 2019

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Judicial Administrator
Federal Court of Appeal
90 Sparks Street, Main Floor
Ottawa, ON K1A 0H9

Dear Sir/Madam:

**Re: Raincoast Conservation Foundation et al v. The Attorney General of Canada,
Trans Mountain Pipeline ULC and Trans Mountain Corporation
Court File No. 19-A-35
Trans Mountain's Response to the July 24, 2019 Direction of the Chief Justice**

We are counsel to Trans Mountain Pipeline ULC and Trans Mountain Corporation in the above noted consolidated matter. We are in receipt of the July 24, 2019 Direction of the Honourable Chief Justice Noël and ask that you bring this correspondence to the attention of the Chief Justice.

As noted in the July 24 Direction, Trans Mountain took no position on 11 of the 12 motions for leave to judicially review the June 18, 2019 Order in Council. Indeed, Trans Mountain recognizes (and has significant experience with) the relatively low threshold for granting leave on such matters. As the Proponent of the Project, the efficient and timely prosecution of this matter is a key priority for Trans Mountain.

In the July 24 Direction, the Court reserves the right to appoint an *amicus* to respond to the motions for leave. In our respectful view, the appointment of an *amicus* will introduce significant and certain delay to the process. Trans Mountain seeks to eliminate any potential for delay. Respectfully, on behalf of our client, we urge the Court not to appoint an *amicus* in the leave process. As noted in previous correspondence to the Court, Trans Mountain intends to vigorously oppose the arguments of any appellants granted leave to appeal.

Yours truly,



Maureen Killoran, QC

Partner

MK:jw

cc: All counsel on electronic service list
Attorney General of Alberta and Attorney General of British Columbia