

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE GOVERNING COUNCIL OF THE UNIVERSITY OF TORONTO

Applicant

and

JOHN DOE, JANE DOE, TAYLOR DOE, PERSONS UNKNOWN, ABDURRAHEEM
DESAI, AVIRAL DHAMIJA, ERIN MACKEY, HEIGO PARSA, KABIR SINGH, KALLIOPE
ANVAR MCCALL, MOHAMMAD YASSIN, SARA RASIKH, SERENE PAUL and SAIT
SIMSEK MURAT

Respondents

NOTICE OF MOTION

The Applicant will make a Motion to a Judge on a date and time to be set by this Honourable Court.

PROPOSED METHOD OF HEARING: The Motion is to be heard in person at 330 University Avenue, Toronto, Ontario.

THE MOTION IS FOR:

- (a) An Order, if necessary, dispensing with and/or validating service of the Application and Motion Materials.
- (b) An interlocutory injunction that the Respondents and each of them and any and all persons having knowledge of the Order, shall be restrained and enjoined from directly or indirectly, by any means whatsoever:

- (i) physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to impede, restrict or in any way physically interfere with access to University property, including Front Campus, King's College Circle and 93 Highland Avenue;
 - (ii) physically preventing, impeding, restricting or in any way physically interfering with, or counselling others to prevent, impede, restrict or in any way physically interfere with the removal of any objects or structures including fences, barriers, tents, encampments or personal property from Front Campus and King's College Circle;
 - (iii) erecting any fences, tents, structures or barriers of any type on University property, including Front Campus, King's College Circle and 93 Highland Avenue; and
 - (iv) using, entering or gathering at Front Campus or King's College Circle without the consent and authorization of the Applicant between the hours of 11 p.m. and 7 a.m.
- (c) An interlocutory injunction that the Respondents and each of them, and any and all persons having knowledge of the Order shall:
- (i) no later than 24 hours after the issuance of an Order, remove any and all structures, tents, encampments, and items of personal property placed or created or imposed by them at King's College Circle and shall permit the

Applicant to have full use and enjoyment of its lands, premises and facilities at Front Campus and King's College Circle; and

- (ii) no later than 24 hours after the issuance of an Order, vacate Front Campus and King's College Circle at the University of Toronto.
- (d) An Order authorizing the Toronto Police Service, the Ontario Provincial Police, and any other police authority (the "Police"), to arrest and remove persons, objects and structures who/which violate the terms of the Order.
- (e) An Order setting out the manner of service of the Order.
- (f) Such further and other relief as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

Parties

- (a) The University of Toronto is one of the top ranked public research universities in the world. It has nearly 700 undergraduate and 200 graduate programs with over 100,000 students enrolled across three campuses in the Greater Toronto Area. The governing legislation of the University of Toronto is *The University of Toronto Act, 1971*, S.O. 1971.
- (b) The Governing Council of the University of Toronto (the "Governing Council") is the legal entity that is responsible for, and vested with the power of, government, management, and control of the University pursuant to *The University of Toronto Act, 1971*.

- (c) The Governing Council is the fee simple owner of the property on which all three campuses are located, being St. George Campus (downtown Toronto), Mississauga and Scarborough.
- (d) The Governors of the University of Toronto are the fee simple owner of the residence of the President of the University of Toronto, which is located at 93 Highland Avenue, Toronto.
- (e) Front Campus is the private property of the University of Toronto located at 1 King's College Circle in the centre of St. George campus.
- (f) John Doe, Jane Doe and Persons Unknown represent people who have occupied or are currently occupying Front Campus at the University of Toronto. They are associated with the Encampment and/or Occupy U of T as defined below.
- (g) Some or all of John Doe, Jane Doe and Persons Unknown are members of the organization "U of T Occupy for Palestine" ("Occupy U of T"). Occupy U of T has made three main demands of the University (the "Three Demands"). The Three Demands, as framed in Occupy U of T's language, are:
 - (i) Divest the university's endowment, pension fund, and other financial holdings from all companies that provide Israel with military goods or services;
 - (ii) Terminate all partnerships with Israeli academic institutions that operate in the Occupied Palestinian Territories, or sustain the apartheid policies, occupation and illegal settlement of these territories; and

- (iii) Publicly disclose all investments (including names of holdings and portfolio shares) from endowments, the pension fund, short-term working capital assets, and other financial holdings of the university.

- (h) Taylor Doe runs and/or posts from the social media accounts of Occupy U of T for Palestine including but not limited to Instagram, X and Telegram.

- (i) Occupy U of T promotes on social media that they are located at the “People’s Circle for Palestine”, by which Occupy U of T means Front Campus located within King’s College Circle, and have stated that “Students will continue occupying the People’s Circle for Palestine until the #uoft Administration publicly commits to meeting all three of our demands immediately.”

- (j) The individual respondents to this motion are all individuals who have publicly identified as participating in the encampment and/or having a leadership role in the Encampment;
 - (1) Abdurraheem Desai is a University of Toronto student who has stated in a media interview that he has been present at the Encampment “from the very beginning” and has slept there every night.

 - (2) Aviral Dhajima is a University of Toronto student who has given media interviews in which he has identified himself as being present at the Encampment since the first day. Mr. Dhajima has acted as a student negotiator in the discussions with the University.

- (3) Erin Mackey is a University of Toronto student who has acted as a media spokesperson for Occupy U of T. She has stated that she has been at the Encampment every day since they started and that she is “one of the organizers...we’ve renamed it the people’s circle for Palestine.”
- (4) Heigo Parsa is believed to be a University of Toronto student who has been described in media interviews as a “protest organizer” for the Encampment.
- (5) Kabir Singh is believed to be a University of Toronto student who has been described in media interviews as a “student spokesperson” for the Encampment.
- (6) Kalliopé Anvar McCall is a University of Toronto student who has acted as a media spokesperson for Occupy U of T. She has declared: “We just want to make it clear, we’re not leaving. We’re staying. As my comrade stated, we live here now and we’ll live here as long as needed to have our demands met.” Ms. McCall has acted as a student negotiator in the discussions with the University.
- (7) Mohammad Yassin is a University of Toronto student who has been described as a “spokesperson” for Occupy U of T. Mr. Yassin has declared that that Occupy U of T planned to stay at the Encampment as long as necessary to have their demands met. Mr. Yassin has acted as a student negotiator in the discussions with the University.

- (8) Sara Rasikh is a University of Toronto student who has been described as a “student spokesperson” for Occupy U of T in several media interviews. She has stated: “We, the University of Toronto students, have established our encampment on the People’s Circle for Palestine (formerly King’s College Circle), and we will not leave until our administration meets our demands with a serious response.”
- (9) Serene Paul is an individual who has spoken on behalf of the Encampment in media interviews stating: “if [UofT] does not respond to us, we will escalate, so disrupting business as usual and not leaving until our demands are met.”
- (10) Sait Simsek Murat is an individual who stated in public social media post that he is a participant in the Encampment and that “we’ll stay until U of T meets the students’ demands.”

Overview

- (a) Since May 2, 2024, Front Campus has been occupied by members of Occupy U of T and other protesters (the “Occupants”).
- (b) The Occupants have publicly “renamed” Front Campus the “People’s Circle For Palestine.”
- (c) The Occupants do not have the authorization of the University of Toronto to occupy Front Campus.

- (d) The Occupants have set up tents, fortifications and other structures on Front Campus (the “Encampment”).
- (e) The Occupants are using a fence around the Encampment, which the University erected, to manage access to Front Campus and the Encampment. They do not have the University’s authorization to do so.
- (f) The Occupants have set up checkpoint access for entry into the encampment with a screening process for entry, which is not authorized by the University and is inconsistent with the University’s values and mandate.
- (g) University officials and others have been denied entry to Front Campus by the Occupants.
- (h) As a result of the occupation and Encampment, Front Campus has not been available to any other members of the University community or the public.
- (i) Since the Encampment started in or around May 2, 2024, community members have reported violence, harmful and discriminatory speech, and damage to the University’s property.
- (j) Certain of the Persons Unknown are responsible for the violence, harmful and discriminatory speech and damage to the University’s property.
- (k) Members of the University community and the public have expressed serious concerns to the University about their health, safety, security, wellbeing, and freedom of speech and expression as a result of the Encampment.

- (l) The Encampment raises serious health and safety concerns for the Occupants, other members of the University Community, and the public.
- (m) The University of Toronto has attempted to assist the Occupants with addressing numerous health and safety concerns arising from the Encampment since May 2, 2024, when permitted to do so by the Occupants, but has been unable to eliminate these concerns.
- (n) Having taken control of the Property and prevented the University from exercising control over it, the leadership of the Occupants including Taylor Doe continue to authorize, permit, and acquiesce in the conduct which has arisen as a result of the Encampment.
- (o) The University of Toronto has attempted to bring an end to the Encampment through negotiations with the leadership of the Occupants, but those negotiations have been unsuccessful.
- (p) On May 24, 2024, the University issued a Trespass Notice under the Trespass to Property Act, directing the Occupants and anyone with notice of the Trespass Notice to vacate Front Campus.
- (q) Following Front Campus being vacated approximately 4-6 weeks of remediation will be required to repair the damage caused by the Encampment.
- (r) The Occupants continued their Encampment over the weekend of May 25 and 26, 2024 and did not vacate Front Campus. Further negotiations have been unsuccessful. The Encampment remained in place as of 8 a.m. on May 27, 2024.

- (s) The Occupants' occupation and Encampment of Front Campus is an illegal trespass.
- (t) The University has and will continue to suffer irreparable harm if the occupation and Encampment are permitted to continue.
- (u) The balance of convenience favours the University.

The University

- (a) The core mission of the University of Toronto is to be an internationally significant research university, with undergraduate, graduate, and professional programs of excellent quality.
- (b) The purpose of the University of Toronto is to foster an academic community in which the learning and scholarship of every member may flourish, with vigilant protection for individual human rights and a resolute commitment to the principles of equal opportunity, equity, and justice.
- (c) The University's Statement on Freedom of Speech provides that "all members of the University must have as a prerequisite freedom of speech and expression, which means the right to examine, question, investigate, speculate, and comment on any issue without reference to prescribed doctrine, as well as the right to criticize the University and society at large".
- (d) The Statement on Freedom of Speech provides that "all members have the freedom to communicate in any reasonable way, to hold and advertise meetings, to debate and to engage in peaceful assemblies and demonstrations, to organize groups for

any lawful activities and to make reasonable use of University facilities, in accordance with its policies as they are defined from time to time and subject to the University's rights and responsibilities.”

- (e) The *Code of Student Conduct* provides that “no person shall cause...a disturbance that the members knows obstructs any activity organized by the University of Toronto...or the right of another member or members to carry on their legitimate activities”.
- (f) The University has issued a *Policy on the Temporary Use of Space and Procedures for the Temporary Use of Space* at the University of Toronto.
- (g) The Occupants have not complied with University's Code of Student Conduct, Policies or the related procedures.
- (h) Freedom of speech and freedom of association for all members of the University community has been limited by the Encampment being occupied by Occupy U of T.

Front Campus

- (a) Front Campus is a gathering place for students, faculty, staff, and members of the public. The University supports and encourages open discussion and expression on Front Campus and throughout the University.
- (b) Front Campus reopened to the University community in October 2023 after being closed for over three years for a redesign and transformation called the Landmark Project.

- (c) The University plans to use the revitalized Front Campus to hold intramural sporting and recreational events, varsity sports training, summer camps for children and other special events.
- (d) An Opening Celebration for the Landmark Project was scheduled for May 27, 2024 which has had to be postponed due to the Encampment.
- (e) Front Campus has traditionally been used for Convocation in June each year, except during the closure for construction. Front Campus was used for Fall Convocation in 2023 and was planned to be used for Convocation in June 2024.
- (f) Many students who belong to this year's graduating undergraduate class graduated from high school and started at the University during the COVID-19 pandemic. As a result of the damage to Front Campus and as long as the Encampment is taking place, the University, its graduands and their families as well as other members of the public will not have the benefit of the newly re-opened Front Campus for Convocation.

Background to the Encampment

- (a) On April 1, 2024, individuals identifying themselves as representatives of Occupy U of T gathered outside University President Meric Gertler's office in Simcoe Hall to stage a "sit-in."
- (b) Occupy U of T thereafter made the Three Demands of the University and ultimately vacated President Gertler's office.

- (c) The University thereafter took steps to ensure campus safety and maintain order in the event of demonstrations on campus.
- (d) Beginning on April 27, 2024, the University erected fencing around the Front Campus field at the centre of King's College Circle to protect the greenspace and prevent unauthorized activity, due to concerns that the space could be used as a site for a potential encampment (the "Fence").
- (e) The University posted signs around King's College Circle notifying members of the public that tents and camping were prohibited.

The Encampment

- (a) On April 28, 2024, the Vice-Provost, Students, Sandy Welsh, posted a message on the online UTogether Community Update page reminding students of the University of Toronto's commitment to free expression and lawful and peaceful protest as well as the necessary limits accompanying those freedoms.
- (b) The University's message reminded students that the University's lands and buildings are private property, and unauthorized activities such as encampments or occupations of University buildings are considered trespassing and contravened University policies and the law.
- (c) On May 2, 2024, approximately 100 protesters breached the Fence at King's College Circle and erected approximately 50 tents inside the perimeter of the Fence on Front Campus.

- (d) The Occupants secured the fenced area and established a “border” patrol including a sign-in sheet and a list of Encampment rules.
- (e) Since the commencement of the Encampment the Occupants have fortified and secured the Fence with chains, metal writing, stakes, 2 x 4s, additional fencing panels, tarps and zip ties.
- (f) Access to the Encampment and therefore to Front Campus is controlled by the Occupants.
- (g) People are denied entry to the Encampment if they do not meet the criteria and/or demands of the Occupants.
- (h) It is fundamentally contrary to the University’s policies and the University’s principle of “inclusive excellence” to exclude any person from any University space because they do not share the same beliefs.
- (i) The Encampment and the Fence do not promote free speech and open discussion at the University. Instead, they limit free speech and expression, including any dissenting opinions from those of the Occupants, on Front Campus.
- (j) The size of the Encampment has grown significantly since May 2, 2024. It currently has approximately 177 tents. During certain demonstrations, there have been thousands of people inside and outside the Fence.
- (k) From the outset of the encampment, the Occupants have been unequivocal in stating that they intend to remain in the encampment until the Three Demands are met.

- (l) Since May 2, 2024 the University has received many concerning reports about violence, property damage, harmful and discriminatory speech, and other health and safety issues within and surrounding the Encampment area. The areas around the Encampment have had reports of:
 - (i) Confrontations between protestors and counter-protestors;
 - (ii) Blocking access to nearby University buildings;
 - (iii) Blocking traffic, including confrontations with motorists.
 - (iv) Accessing the roofs of nearby University buildings to raise Palestinian flags or other flags relating to the protest;
 - (v) Anti-Semitic slurs, harmful and discriminatory and threatening speech, posterage and other communications;
 - (vi) Multiple physical assaults;
 - (vii) Swarming;
 - (viii) Forcible denial of access to the Encampment; and
 - (ix) Vandalism and property damage.
- (m) At least seven significant health and safety concerns have been identified and associated with the Encampment:
 - (i) Poor emergency egress and evacuation capacity;

- (ii) Fire hazards;
 - (iii) Large gatherings and crowd control issues;
 - (iv) Slip, trip and fall hazards;
 - (v) Animal hazards;
 - (vi) Garbage and biohazardous material; and
 - (vii) Fencing concerns.
- (n) In addition, members of the University and the public who simply wish to go for a walk, sit and read a book on a bench, do their homework outside, or engage in any other activity on Front Campus are precluded from doing so. They may not enter the Encampment, which takes up the majority of the area on Front Campus, unless they meet the Occupants' requirements.

The Negotiations

- (a) Since May 2, 2024 the University has engaged in negotiations with the Occupants in an effort to bring a peaceful resolution to the Encampment.
- (b) On May 12, 2024, five University administrators met with a group of individuals representing Occupy U of T to negotiate a resolution to the Encampment. The University offered to initiate and help the Occupants with navigating the divestment review process. The individuals representing Occupy U of T stated that if their demands were not satisfactorily met, they would live on the University's lawn (i.e., Front Campus) indefinitely.

- (c) On May 13, 2024, the Occupants spoke to local news about the May 12 meeting with the University and stated that the Encampment would continue, potentially into the fall. The University did not issue any public statement of its own.
- (d) On May 15, 2024 the University again met with representatives of Occupy U of T for the purposes of negotiations relating to the Demands.
- (e) On May 18, 2024 the University held its third meeting with representative of Occupy U of T for the purposes of negotiations relating to the Demands.
- (f) On May 22, 2024 the Occupy U of T X account posted a critical and unfair post about Sandy Welsh, one of the University's negotiators, which included profanity. The post was later deleted. Paper copies of the post were later printed into poster board and posted on campus, including on the fence of the Encampment.
- (g) On May 22, 2024, a number of protests appearing to be associated with Occupy U of T occurred at other University of Toronto buildings including blocking entry to the buildings.
- (h) On May 23, 2024 the University again met with representatives of Occupy U of T for the purposes of negotiations relating to the Demands;
- (i) At the May 23, 2024 meeting the University presented the representatives of Occupy U of T with an offer and explained that it was open for 24 hours. If the offer was not accepted by May 24, 2024 at 4 p.m., a notice of trespass would be issued.

- (j) On May 24, 2024 Erin Mackey, as a representative for Occupy U of T publicly stated “we’re here and we’ll continue to be here.”
- (k) On May 24, 2024 the social media account for Occupy U of T posted the University President’s letter to the community and said “day 23, we’re not going anywhere” and “Meric Gertler F*** your grass shove this letter up you’re a**.”
- (l) The University’s offer was not accepted by 4 p.m. on May 24th.
- (m) Occupy U of T acknowledged receipt of the offer and said that they would be ready to meet on Sunday May 26, 2024 at 5 p.m.
- (n) On May 24, 2024 just after 4 p.m. the University disseminated a trespass notice at and around the Encampment and to the Occupy U of T email address.
- (o) The trespass notice provided “if you do not comply and remain in the encampment at King’s College Circle and Front Campus after Monday, 27, 2024 at 8 a.m. the University will pursue consequences under University policies and the law.”
- (p) The cover note to the trespass notice provided “If the encampment participants do not vacate Front Campus at King’s College Circle by Monday, May 27, 2024 at 8 a.m., the University will be taking all necessary legal steps including seeking an Order from the Ontario Superior Court of Justice.”
- (q) The evening of May 24, 2024 Toronto Police Service received a call from a neighbour to the University’s President’s residence who observed a series of

trespass notices placed along the gates and front doors of personal residences on Highland Avenue.

- (r) The satirical “trespass notice” stated that “your neighbour, University of Toronto President Meric Gertler, is evicting his students for peacefully protesting the University’s investments in the genocide on Palestine...Tell Meric Gertler to respect the students demands and to keep his hands off peaceful protestors.”
- (s) At 11 a.m. on May 26, 2024 the representatives of Occupy U of T held a press conference to announce their counter offer.
- (t) During the evening on May 26, 2024 the University met with representatives of Occupy U of T for the purposes of negotiations relating to the Demands. No settlement was reached.

Harm to the University

- (a) The University has suffered and continues to suffer irreparable harm.
- (b) The Encampment has associated the University with the conduct of the Occupants in that the University's inability to control the violence, harassment, harmful and discriminatory speech, and property damage occurring on the Property and to members of the University community and the public have undermined the University's reputation as a free and open atmosphere for respectful discussion and debate and as a safe place for higher education.

- (c) Community members have reported seeing deeply disturbing language in or around the encampment such as “Zionists go back to Europe”, “Glory to the Martyrs” and “Burn Tel Aviv Down”.
- (d) Similarly, community members have reported being swarmed, assaulted or harassed because of their views, their heritage or other personal characteristics.
- (e) This type of behaviour and communication is antithetical to the University’s values. Any association with such language on the University campus undermines the University’s reputation and the safety of its community.
- (f) Since the Encampment started on May 2, 2024, the University has received thousands of pieces of communications about the Encampment.
- (g) There is correspondence from members of the community in support of the Encampment and the demands of Occupy U of T.
- (h) There are similarly thousands of communications by students, faculty, alumni, donors, parents and concerned members of the University community and the public at large about the Encampment, the effect it has had on them personally, on their children who attend the University and on the University’s reputation.
- (i) Many members of the University’s community have expressed concern about their inability to assemble, feel safe or express their opinion, on University property.
- (j) The University has been unable to access its own property to use for celebrations, activities, or for open and free dialogue.

- (k) The University has had to limit the access to its buildings in order to provide a safe environment to the University community. This has undermined the University as a free an open place for higher education and community engagement.

An Order Should be Granted

- (a) The Occupants have no lawful right to occupy Front Campus and King's College Circle. The continued presence of the Encampment at Front Campus and King's College Circle is therefore a violation of the *Trespass to Property Act*, RSO 1990, c T 21.
- (b) The balance of convenience favours the interlocutory orders sought by the Applicant.
- (c) The University as an autonomous academic institution is not subject to the Charter in its exercise of property rights.
- (d) The balance of convenience in connection with free expression values favours the granting the University an injunction, which will restore the University's ability to preserve the space as an open, free and public atmosphere for respectful discourse and debate.
- (e) The interference with the Occupants' freedom of expression are minimal. Nothing in the relief sought by the University interferes with the ability of the Occupants to express their opinions and to engage in respectful discussion and debate. The commission of torts is not a protected form of expression.
- (f) The Applicant has given an undertaking as to damages.

- (g) Section 101 of the *Courts of Justice Act*, R.S.O. 1990 c. C. 43.
- (h) Rule 40.01 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.
- (i) Such further and other grounds as the lawyers may advise.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

- (a) The affidavits of:
 - (i) Sandy Welsh, to be sworn;
 - (ii) Ron Saporta, to be sworn; and
 - (iii) Ryan Dow, to be sworn.
- (b) Such further and other evidence as the lawyers may advise and this Honourable Court may permit.

May 27, 2024

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Respondent

THE GOVERNING COUNCIL OF THE UNIVERSITY OF
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-and- JOHN DOE et al.

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Court File No. CV-24-00720977-0000

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NOTICE OF MOTION

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