

COURT OF APPEAL FOR ONTARIO

(Court seal)
BETWEEN:

PAUL TAYLOR

Appellant
(Moving Party)

- and -

THE WORKPLACESAFETY & INSURANCE BOARD – WSIB,

- and -

THE WORKPLACESAFETY & INSURANCE APPEALS TRIBUNAL – WSIAT

Respondents
(Responding Party)

COURT OF APPEAL FOR ONTARIO
RECEIVED / REÇU

AUG 27 2018

NOTICE OF MOTION

REGISTRAR / GREFFIER
COUR D'APPEL DE L'ONTARIO

Mr. Paul Taylor, the moving party of this motion, and who is the appellant in an appeal against the respondents, will make a motion to the Court of Appeal for Ontario on **Thursday the 13th, of September 2018, at 10:00am** or soon after that time as the motion can be heard, which will be prior to the appeal of *Taylor v. WSIB & WSIAT* C65144 at **The Court of Appeal for Ontario** 130 Queen St. W. Toronto, Ontario.

PROPOSED METHOD OF HEARING: The motion is to be heard orally.

THE MOTION IS FOR: Permission/Leave of the Ontario Court of Appeal to have the appeal hearing to be heard by this Honourable Court on September 13th, 2018, bearing *court file No. C65144* to

be live video streamed via the internet. The purpose is to accommodate persons with disabilities who have a vested interest in the appeal hearing, but due to their disabilities are unable to physically attend.

THE LEGAL GROUNDS FOR THE MOTION ARE:

1. In accordance with the Rules of Civil Procedure R.S.O. 1990:
 - a) Rule 61.16 (1) “*Rule 37, except rules 37.02 to 37.04 and rule 37.17 applies to motions in an appellate court, with necessary modifications.*”
 - b) Rule 37.01 “*A motion shall be made by a notice of motion...*”
2. In accordance with the section 1, of the *Ontario Human Rights Code* R.S.O. 1990, which states that: “*Every person has a right to equal treatment with respect to services, goods and facilities, without discrimination because of...disability*”
3. In accordance with section 1, 2, and 4 of the *Ontarians with Disabilities Act* S.O. 2001.
4. That section 52 of the *Constitution* provides that the constitution and all its parts are the Supreme law of Canada. Furthermore, section 15 of the *Charter* provides that individuals are equal before the law and have the right to equal treatment.

THE FACTUAL GROUNDS FOR THE MOTION ARE:

5. Mr. Taylor filed an application for Judicial Review – Writ of Mandamus with a motion for urgency with the Superior Court. Mr. Taylor’s application and motion were subsequently denied by the court.
6. Mr. Taylor subsequently filed an appeal with this Honourable Court. The appeal is scheduled to be heard on September 13th, 2018.
7. Mr. Taylor learned from injured workers who have disabilities that they have a vested interest in attending the appeal hearing, but due to their disabilities they are unable.
8. That all persons can attend and take part in the observing of Canada’s court process, with the rare exception of certain sensitive cases such as family law and child offence cases. This is not one of these cases.
9. With the advancement of technology, and social media, it is easily possible for Mr. Taylor or the court to accommodate the disabled persons by video streaming the appeal hearing on the internet.

THE FOLLOWING DOCUMENTARY EVIDENCE

10. Affidavit and supporting documents of the moving party, Mr. Paul Taylor,
11. Affidavit and supporting documents of various other disabled persons,
12. Motion Record, Factum of moving party, Mr. Paul Taylor.

Date: August 27, 2018

Paul Taylor



Moving Party
Self-represented

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Lawyers for the Government of Ontario

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Lawyers for the Government of Canada

BACKSHEET

Taylor
(Appellant)

v.

The WSIB & The WSIAT
(Respondents)

Court file No. _____

Court of Appeal for Ontario

PROCEEDING COMMENCED AT

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NOTICE OF MOTION

Appellant:
Paul Taylor

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