



CASE STUDY: THE MIHALY REPORT

ENGG 513 - W2018: The Roles and Responsibilities
of the Professional Engineer in Society

February 16, 2018

Submitted To:
Dr. Denis Onen

Authors:
Christopher Chu
Rohit Kaler

Introduction

This report outlines the details and conclusions of the Mihaly case. It also critiques and discusses the outcomes of the case made by the Alberta Human Rights Commission, The Court of Queen's Bench, and the Alberta Court of Appeal. Mr. Ladislav Mihaly was an engineer who was born and educated in Czechoslovakia. He immigrated to Canada in 1999 and applied to APEGA for professional engineering status. Because his degree was foreign, APEGA's Board of Examiners (BOE) requested Mihaly write the National Professional Practice Exam (NPPE) and three complimentary exams. Over a span from 2000-2003, Mihaly wrote and failed the NPPE three times and his application was withdrawn. In 2006, Mihaly's application was reactivated and the BOE requested he pass the NPPE, Fundamentals of Engineering exam, and obtain one year of Canadian engineering experience (APEGA, 2016). In 2008, Mihaly filed a human rights complaint against APEGA citing discrimination based on place of origin. From 2008 to 2012, the complaint was investigated and dismissed without a hearing. After being appealed to the chief commissioner in 2013, the hearing was directed to the Alberta Human Rights Tribunal. In 2014, the Tribunal ruled Mihaly's credentials constituted systematic discrimination, directed the application to be reconsidered, and awarded damages to Mihaly of \$10,000. APEGA appealed the ruling and Mihaly cross appealed seeking millions in damages. In 2016, the Court of Queen's Bench overturned the Tribunal's decision citing errors in the case and Mihaly's cross appeal was dismissed. Mihaly appealed to the Court of Appeal in 2016, but failed to take the required steps to advance the appeal. In 2017, the Court of Appeal refused for the appeal to proceed, ruling that APEGA is entitled to have some finality to proceeding which questions its procedures for evaluating foreign credentials. This case challenged the APEGA's evaluation of internationally educated credentials and the neutrality of the system (Casey, 2017).

Stakeholders

The stakeholders in the case study are the people and organizations directly involved or impacted by Mr. Mihaly's complaint. These are outlined below.

Association of Professional Engineers and Geoscientists of Alberta (APEGA)

APEGA is the regulatory body in practices of engineering and geoscience in Alberta. APEGA appoints a Board of Examiners (BOE) to examine the qualifications of foreign technical degrees. The BOE is able to request applicants to write complimentary examinations if their credentials are not equivalent to degrees offered by Canadian institutions. During the Mihaly case, APEGA was targeted by Mihaly on the basis of discriminatory allegations (APEGA, 2016).

The Alberta Human Rights Commission

An independent commission of the Government of Alberta that fosters equality and reduces discrimination. The commission aims to assist Albertans in resolving human right complaints (Government of Alberta, 2018). In the Mihaly report, the Alberta Human Rights Commission was the initial body Mihaly filed a human rights complaint to and the first body to make a ruling on the case. The commission ruled for Mihaly to be awarded \$10,000 in damages, APEGA to reconsider the application, and APEGA to match Mihaly with a mentor. This ruling was on the basis that APEGA had committed systematic discrimination when evaluating Mihaly's credentials (APEGA, 2016).

The Court of Queen's Bench

The Court of Queen's Bench is the Superior Trial Court for the Province, hearing trials in civil and criminal matters, and appeals from decisions of the Provincial Court. In Mihaly's case, the Court of Queen's Bench heard appeal from APEGA and cross appeal from Mihaly after Human Rights Tribunal's decision that system for evaluating Mihaly's credentials constituted systemic discrimination. The Court of Queen's Bench over-turned Human Rights Commission's decision by pointing out numerous errors and dismissed Mihaly's cross appeal which sought millions in damages (APEGA, 2016).

Alberta Court of Appeal

The Court of Appeal hears criminal appeals from the Provincial Court and both criminal and civil appeals from the Court of Queen's Bench. It also hears appeals from administrative and board Tribunals. The Court of Appeal does not re-try cases. Rather, the Court of Appeal reviews the record to determine whether errors of law or fact were made in a decision (Court of Appeal of Alberta, 2018). Mihaly appealed to Alberta Court of Appeal after the Court of Queen's Bench overturned Tribunal's decision citing errors in his case.

Mr. Ladislav Mihaly

Mihaly was born and educated in Czechoslovakia. He immigrated to Canada and applied for and was denied status as a professional engineer by APEGA. Mihaly attempted APEGA's required confirmatory exams for foreign educated persons, but failed and did not attempt future examinations. Mihaly submitted a complaint to the Alberta Human Rights Commission claiming APEGA discriminated against him on the basis of place of origin. This case was later appealed to the Court of Queen's Bench and the Alberta Court of Appeal (Alberta Human Rights Commission, 2014).

Madam Justice June Ross

Justice Ross practiced law in Alberta from 1981 to 1988. She served as a member of the Faculty of Law at the University of Alberta from 1998 until 2003. Afterwards, she was appointed to the Alberta Court of Queen's Bench where she served as the judge on the Mihaly case that made the ruling on APEGA's appeal of the Alberta Human Rights Commission's decision (Thompson, 2013).

Judge Moosa Jiwaji

Judge Jiwaji practiced law for over 20 years. He served as the human rights commissioner on the Alberta Human Rights Commission during the Mihaly case. He sided controversially with Mihaly and later was removed from the Alberta Human Rights Commission (Gerson, 2014).

Foreign Educated Engineers and Geoscientists

The Mihaly case challenged APEGA's evaluation of international credentials pertaining to engineering and geoscience. This had implications on the future screening of immigrant engineers and geoscientists with education credentials outside of Canada. It also had implications on past cases disputing human rights and discrimination involving foreign credentials.

Background

In 2008, Mr. Ladislav Mihaly filed a human rights complaint against the Association of Professional Engineers and Geoscientists of Alberta (APEGA). Having been denied professional engineering status in Canada, Mihaly challenged that the APEGA board had discriminated against him on the basis of his place of origin. His education was not recognized as an equivalent to the engineering degrees offered by Canadian universities. To compensate for the damages for loss of income, Mihaly sought \$1,000,000 from APEGA and \$2,000,000 from APEGA if he was not registered as a professional engineer (APEGA, 2016).

Mr. Mihaly was born in Czechoslovakia. He obtained a M.Sc. Diploma with a specialization in Technology of Fuels and Thermal Energy from the Slovak Technical University of Bratislava in 1975. In 1981, Mihaly obtained a Certificate in Corrosion Engineering from the Institute of Chemical Technology (ICT) in Prague, Czechoslovakia. Mihaly immigrated to Canada in May 1999 in hopes of progressing his career in Canada (APEGA, 2016). Upon arriving in Canada in May 1999, Mihaly applied for professional engineering status to the Association of Professional Engineers and Geoscientists of Alberta (APEGA). In his Application of Registration, Mihaly included his two master degrees obtained from Czechoslovakia as well as three references who he had worked for from his days in Bratislava (Alberta Human Rights Commission, 2014).

APEGA acknowledged Mr. Mihaly's application in May 13, 1999 and requested his transcripts, along with a request to write the National Professional Practice Exam (NPPE). After reviewing Mr. Mihaly's transcripts in support of his application, APEGA's Board of Examiners advised him to complete three confirmatory examinations and take a course or pass an equivalent examination in Engineering Economics in addition to passing NPPE by May 2001. Mr. Mihaly failed his first attempt at NPPE on January 17, 2000. He applied to write NPPE again on October 16, 2000, however, he never showed up to write the exam. APEGA withdrew his application since he had failed write required confirmatory examinations by May 2001. On June 3, 2002, APEGA reactivated Mr. Mihaly's application upon his request. He attempted the NPPE on July 15, 2002 and failed. He again sat the NPPE on January 20, 2003 and failed. On August 1, 2003 APEGA again withdrew his file because of the same reasons. Mr. Mihaly asked APEGA to reactivate his file for the third time on October 6, 2006 (APEGA, 2016).

APEGA reactivated his file and given the passage of time, APEGA requested from him an updated resume and list of updated references. Mr. Mihaly provided this information on November 16, 2006. On August 10, 2007, the Board of Examiners reconsidered Mr. Mihaly's application and again determined that Mr. Mihaly had to complete three confirmatory examinations plus a course or examination in Engineering Economics, or the Fundamental of Engineering Examination (FE Exam). The Board also determined that Mr. Mihaly had not acquired the one year of Canadian professional engineering experience in the position where he had worked because it was not a D level. He was therefore required to obtain one-year acceptable D level Canadian engineering experience. Mr. Mihaly did not write the required examinations. On August 5, 2008, he filed a complaint with the Alberta Human Rights Commission, pursuant to the *Alberta Human Rights Act, RSA 2000, c A-25.5* [AHRA], alleging

that APEGA discriminated against him based on his place of origin when it denied him registration as a professional engineer (Alberta Human Rights Commission, 2014).

APEGA regulates the practice of engineering and geoscience in Alberta under the *Engineering and Geoscience Professions Act* (EGPA) and the *Engineering and Geoscience Profession General Regulation* (EGPR). According to the EGPA, an individual is not permitted to practice engineering in Alberta unless approved for registration pursuant. Applications for registration as a professional member of APEGA are considered by the Board of Examiners. As specified by the EGPA, applicants must be either a Canadian citizen or permanent resident of Canada, be of good character and reputation, and possess knowledge of the EGPA and practice of engineering or geoscience as demonstrated by passing an examination prescribed by the Board of Examiners. These examinations are facilitated for the purpose of correcting a perceived academic deficiency (APEGA, 2016).

Three witnesses gave evidence before the Tribunal on behalf of APEGA's registration processes. Dr. David Lynch, University of Alberta Dean of Engineering and member of the Canadian Engineering Accreditation Board (CEAB), testified that the CEAB assesses engineering programs internal and external to Canada. Canada and other countries with equivalent accreditation processes for engineering programs may enter Mutual Recognition Agreements (MRAs). However, Slovakia had not applied through this process. Dr. Gary Faulkner, Chair of the APEGA Board of Examiners, testified about the review of Mihaly's application. It was found that his program was close Chemical Engineering and that, despite having a long experience in piping design and fabrication, was not the type of experience which had increased in responsibility or complexity. Mr. Mark Tokarik, Deputy Registrar for APEGA, provided further evidence regarding the application. He stated that the Fundamental Engineering exam or complimentary exams would be required if the applicant's degree was not on the Foreign Degree list (APEGA, 2016).

In 2014, the Alberta Human Rights Tribunal ruled Mihaly to be awarded \$10,000 and APEGA to reconsider the application. This was made on the basis of discrimination on place of origin and that APEGA could not justify its registration requirements. Afterwards, APEGA appealed the Tribunal's decision to the Court of Queen's Bench. In response, Mihaly cross appealed claiming \$1,000,000 from APEGA or \$2,000,000 from APEGA if he was not registered as a professional engineer. In 2016, the Court of Queen's Bench reversed the Alberta Human Rights Commission Tribunal decision in allegations made by Mihaly. Mihaly's cross-appeal claiming compensation for lost income was also denied. The Queen's Bench ruled that the Tribunals ruling contained illogical errors and unreasonable interpretations of the legislation (Cotter, 2016). Another appeal was escalated to the Alberta Court of Appeal in 2016 by Mihaly. The Court of Appeal refused to proceed as Mihaly did not take the proper procedures to advance the appeal. In 2017, the case concluded with the Court of Appeal ruling that APEGA is entitled to have some finality to proceeding which questions its procedures for evaluating foreign credentials (Casey, 2017).

The Court of Queen's Bench Decision

The Alberta Human Rights Commission, Court of the Queen's Bench, and Court of Appeal each came to a ruling on the Mihaly case, with the latter two bodies ruling against Mr. Mihaly. The initial ruling was made by the Alberta Human Rights Commission in 2014. The Tribunal ruled the application be reconsidered on the basis of systemic discrimination when evaluating Mihaly's credentials. Mihaly was also awarded damages of \$10,000 to compensate for his inability to practice as a professional engineer. The Tribunal also ruled that APEGA to match Mihaly with a mentor and direct to networking and language resources. In November 2014, this decision was appealed by APEGA and dealt with by the Court of Queen's Bench Decision. Mihaly submitted a cross appeal seeking damages of \$1,000,000 and registration with APEGA or \$2,000,000 if not registered as a professional engineer with APEGA (Casey, 2017).

The court requested counsel for the Tribunal to address the following legal issues: impact of this court's decision in *Grover v Alberta (Human Rights Commission) 1996*, test for prima facie discrimination, and test for the defense of a bona fide occupation requirement. The Tribunal filed answers to these questions March 19, 2015 and the appeal proceeded. In the times between the Tribunal ruling and the appeal hearing, the Supreme Court of Canada had released decisions on *Mouvement laïque Québécois v Saguenay*, *Quebec v Bombardier Inc*, and *Steward v Elk Valley Coal Corporation*. These decisions aided the court in evaluating the Mihaly case. Questions of procedural fairness were reviewed on the basis of whether the proceedings met the level of fairness required by the law and questions of law concerning the interpretation of the Alberta Human Rights Act were reviewed for reasonableness (APEGA, 2016).

The test for prima facie discrimination was reviewed on the correctness standard as seen in the *Saguenay* case. The correctness standard evaluates a decision based on whether it is correct in the law (Grossell, 2014). In the *Saguenay* case, the correctness standard was applied when evaluating the neutrality of the freedom of conscience and religion protected under the Quebec Charter. Under the charter, it was found that bylaw to discontinue prayer before municipal meetings was incompatible with the freedom of religion (Supreme Court of Canada, 2015).

The court found a lack of evidence in the record to support the Tribunal's decision as per the reasonableness standard used in the Supreme Court cases. The reasonableness standard is a baseline that the court uses to assess a decision made by another party, in this case the Tribunal (Grossell, 2014). The baseline includes findings of fact based on: no evidence, irrelevant evidence, disregard for evidence, or irrational inferences of fact (APEGA, 2016). In the *Bombardier* case, this standard allowed the Supreme Court to rule the initial Tribunal ruling was not supported by sufficient evidence and therefore was invalid (Supreme Court of Canada, 2015). In the *Stewart* case, the court ruled Elk Valley Coal had accommodated Stewart reasonably after his drug incident and termination based on evidence of rehabilitation assistance and future employment opportunities and therefore did not discriminate against him (Supreme Court of Canada, 2017).

APEGA questioned whether the Tribunal ruling was procedurally fair, within their jurisdiction, whether there were valid tests of prima face discrimination, and whether the Tribunal's decision

on APEGA's registration requirements was reasonable. These issues were considered in detail by Madam Justice Ross of the Court of Queen's Bench (APEGA, 2016).

The Tribunal concluded the examinations assigned by APEGA were not for the purpose of correcting a perceived academic deficiency. APEGA submitted that the Tribunal breached the duty of fairness by basing the decision on the grounds that the parties did not advance. The Human Rights Commission did not ask for submissions on its interpretation of the EGPR. However, it was found that APEGA did have an opportunity to respond to all of the evidence and submissions that were made. The Queen's Bench ruled that the rules of procedural fairness were not breached (APEGA, 2016).

APEGA submitted that the Tribunal had no jurisdiction over Mihaly's complaint because the Alberta Human Rights Association does not protect against discrimination on the basis of place of origin of academic qualifications as found in the *Grover v Alberta (Human Rights Commission)* case. In this case, Dr. Grover alleged discrimination on the basis of place of origin against Canadian-trained PhDs. The ruling was that the human rights act does not protect against place of origin of academic qualifications. In the Mihaly case, Madam Justice June Ross found that the jurisdiction issues was better determined using the prima facie discrimination test from the *Moore v British Columbia* case (APEGA, 2016).

Under the Moore test, establishing prima facie discrimination requires complainants to show evidence of a characteristic protected from discrimination, that they experienced an adverse impact, and that the protected characteristic was a factor in the adverse impact. By applying this test, the Human Rights Tribunal found APEGA to be guilty of prima facie discrimination on basis of place of origin. However, Justice Ross disagreed with this ruling stating the evidence did not demonstrate that Mihaly's origin was a factor any disadvantage that he may have experienced as a result of APEGA's requirements and that there was no finding that the requirement to pass the exams and the one year of Canadian experience had an adverse impact on Mihaly based on his origin. Justice Ross concluded that the Tribunal's failure to apply the Moore test via the examination and Canadian experience requirements made the Tribunal's ruling of prima facie discrimination in relation to these factors unreasonable (APEGA, 2016).

To establish justification, the test requires the defendant to prove that the standard is reasonably necessary to accomplish its purpose or goal, in the sense that the defendant cannot accommodate persons with the characteristics of the claimant without incurring undue hardship. Justice Ross concluded that the Tribunal had failed to consider relevant factors in the assessment of undue hardship and therefore its conclusions in regards to APEGA's failure to accommodate Mihaly to the point of undue hardship were unreasonable (APEGA, 2016). Accommodation to the point of undue hardship should not result in APEGA having to act outside of its regulatory role (Field Law, 2016).

The Tribunal also failed to consider that Mihaly had never attempted his three confirmatory examinations or the Fundamentals of Engineering Exam (FEE). Justice Ross concluded that there was no evidence that internationally educated graduates with entry-level competence would have any difficulty passing the FEE (Field Law, 2016). She also stated that because there are

several thousand engineering programs, APEGA does not have the capacity or resources to discuss and negotiate agreements with all of them, and must therefore assign examinations to assess the quality of engineering programs that are undertaken by applicants. This further discredited the ruling of the Alberta Human Rights Commission (APEGA, 2016).

The Court of Queen's Bench overturned the Human Rights Tribunal decision, concluding that decision contained logical errors, had elements unsupported by evidence, and had unreasonable interpretations of the legislation. Mihaly's cross appeal for damages was also dismissed (APEGA, 2016). Mihaly later appealed to Court of Appeal but failed to take the required steps to advance the appeal. Eventually, Mihaly reapplied to the Court of Appeal to reconsider the appeal. However, in 2017, the Court of Appeal refused to allow the appeal to proceed, ruling that APEGA is entitled to have some finality to proceeding which questions its procedures for evaluating foreign credentials. The Court of Appeal also ruled that Mihaly did not outline any errors in the Court of Queen's Bench decision (Casey, 2017).

Reflection and Opinion

The Alberta Human Rights Commission's decision to side with Mihaly was unjustified as it did not consider the fact that Mihaly did not attempt his confirmatory exams after failing previously. It also received heavy criticism and the judge of the Tribunal, Moosa Jiwaji, ended up being removed from his position (Gerson, 2014). The exams are not designed to be brutally difficult, rather to confirm that the test taker is competent in the fundamentals of their area of expertise. Seeing as Mihaly failed his attempted exams and deliberately did not attempt other required exams shows a lack of knowledge and interest in obtaining his professional designation. As such, Mihaly should not be considered to become a professional engineer and the Tribunal should have ignored his complaint. The Human Rights Commission ruling on the Mihaly case also leads to the issue of repeat cases. Seeing that Mihaly benefitted from filing a human rights complaint, what is stopping other immigrants in a similar situation from complaining to the Alberta Human Rights Commission?

The Court of the Queen's Bench provided a logical ruling. Its decision that the Tribunal lacked evidence in their ruling and lack of consideration for Mihaly's negligence in writing his exams are spot on. Mr. Mihaly's failures on the required engineering examinations show incompetence in his area of expertise. APEGA is an association that must put the public's best interest above all else. The definition of a profession is "A calling requiring specialized knowledge and often long and intensive preparation including instruction in skills and methods as well as in the scientific, historical, or scholarly principles underlying such skills and methods, maintaining by force of organization or concerned opinion high standards of achievements and conduct, and committing its members to continued study and to a kind of work which has for its prime purpose the rendering of a public service." (Andrews, 2013). Allowing Mihaly to practice engineering within the jurisdiction of Canada would be a disservice to the public. Permitting an engineer lacking knowledge is dangerous for workers and the public. For example, in the Quebec Bridge Collapse, Theodore Cooper's poor judgement on the bridge weight ended up causing the bridge to collapse and claimed the lives of 75 workers (Andrews, 2013).

The Alberta Court of Appeal's denial of Mihaly's appeal and statement that APEGA should be in control of evaluating foreign credentials was a good decision. Accreditation is different in other countries and it is possible that other countries do not hold their professions to the same standards as Canada. Consequentially, they may be more lenient, for example awarding 2 year programs as engineering or geoscience degrees, or have accreditation dissimilar to Canadian engineering or geoscience degrees. Therefore, it is necessary to require foreign educated applicants to write examinations in order to standardize their knowledge so that it is comparable to a Canadian educated engineer or geoscientist. It is likely that the Mihaly case will have future implications on cases involving foreign credentials and place of origin issues. Hence, it is critical that standards are established so that the best professionals are allowed to practice in the country. Ultimately, the final ruling of the Mihaly case was adequate in that it justified APEGA's authority to screen foreign applicants while remaining in a regulatory role (Casey, 2017).

APEGA should not accommodate foreign-trained engineers and geoscientists. The required exams for foreign credentialed recipients are designed to test fundamental knowledge of the profession. Seeing that Mihaly failed his exams and did not attempt future required exams, indicates incompetence and lack of interest in his area of study. Rather than study to pass the required exams, Mihaly filed an appeal to the Alberta Human Rights Commission. These actions show Mihaly's character as lazy and entitled, characteristics not reminiscent of a professional engineer. Accommodating these types of people would dilute the profession with mediocracy. This is not only detrimental to economic productivity, but to also public safety. A profession has a duty to protect the public interest and allowing unqualified individuals fails this duty.

It is justifiable to require international applicants to write special confirmatory exams to establish entry-level competency to protect public safety (Casey, 2017) . The reputation of the engineering and geoscience profession must be preserved in order to maintain public trust. Allowing subpar unqualified immigrants into the country will burden the economy and tarnish the image of the engineering and geoscience profession. To prevent this, the system must accept the best foreign educated applicants.

All practicing engineers and geoscientists should be held to the same standards. Providing accommodations to foreign educated professionals is unfair to the locally trained engineers and geoscientists who obtain their credentials fairly. It adds increased competition in the job market, leading to higher unemployment rates for local professionals and causing an overall weaker economy. Furthermore, changing the legislature to accommodate future foreign educated professionals is not fair to the past foreign educated professionals who had to pass the confirmatory examinations and the Fundamentals of Engineering Exam.

Overall, the overturning of Mihaly's claim of discrimination was correct. It is not discriminatory to require international applicants to meet the same entry-level competency requirements other applicants must meet, such as a standard exam and one-year Canadian experience (Casey, 2017). Mihaly failed his examinations multiple times and refused to write future required examinations. There was no evidence of place of origin being a factor in his examination failures. It seems that Mihaly was seeking special treatment after his ineptitude on the required engineering examinations. Standing against Mihaly's case set standards and should deter similar complaints.

References

- Alberta Human Rights Commission. (2014). *Mihaly v. The Association of Professional Engineers, Geologists and Geophysicists of Alberta, 2014 AHRC 1 (CanLII)*. Edmonton, Alberta.
- Andrews, G. C. (2013). *Canadian Professional Engineering and Geoscience Fifth Edition*. Toronto, Ontario: Nelson Education Ltd.
- APEGA. (2016). *Association of Professional Engineers and Geoscientists of Alberta v Mihaly, 2016 ABQB 61*. Edmonton, Alberta: APEGA.
- Casey, J. (2017). *Mihaly v. APEGA: Lessons Learned And Strategic Responses by Regulators*. Retrieved from fieldlaw.com: <https://engineerscanada.ca/sites/default/files/board/01-Sept-2017-Mihaly-APEGA-Open-Forum-en.pdf>
- Cotter, J. (2016, January). *Alberta human rights ruling on Czech-trained engineer's accreditation reversed*. Retrieved from CBC News: <http://www.cbc.ca/news/canada/calgary/alberta-human-rights-commission-rules-apega-discriminates-against-engineer-1.3425144>
- Court of Appeal of Alberta. (2018). *Role and Operation of the Court of Appeal of Alberta*. Retrieved from Court of Appeal of Alberta: <https://albertacourts.ca/ca/about/role-and-operation>
- Field Law. (2016, June 6). Human Rights PowerPoint. fieldlaw.com.
- Gerson, J. (2014, March). *Alberta judge who handed down controversial ruling on engineer professional standards no longer at Human Rights Commission*. Retrieved from National Post: <http://nationalpost.com/news/canada/alberta-judge-who-handed-down-controversial-ruling-on-engineer-professional-standards-no-longer-at-human-rights-commission>
- Government of Alberta. (2018). *Homepage*. Retrieved from Alberta Human Rights Commission: <https://www.albertahumanrights.ab.ca/Pages/default.aspx>
- Grossell, M. (2014). *Standard of Review in Administrative Law*. Retrieved from CanLII Connects: <http://canliiconnects.org/en/summaries/31308>
- Supreme Court of Canada. (2015, April). *Mouvement laïque québécois v. Saguenay*. Retrieved from Judgments of the Supreme Court of Canada: <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/15288/index.do>
- Supreme Court of Canada. (2015, July). *Quebec (Commission des droits de la personne et des droits de la jeunesse) v. Bombardier Inc. (Bombardier Aerospace Training Center)*. Retrieved from Judgments of the Supreme Court of Canada: <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/15471/index.do>
- Supreme Court of Canada. (2017, June). *Stewart v. Elk Valley Coal Corp.* Retrieved from Judgments of the Supreme Court of Canada: <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/16679/index.do>
- Thompson, K. (2013). *Three former faculty members appointed as Honorary Professors*. Retrieved from University of Alberta Faculty of Law: <https://www.ualberta.ca/law/news/main-news/2013/november/formerfacultyappointedhonoraryprofessors>